

## Appendix 1: Consultation Responses

Stakeholder	Question/Comment	Response
INTERNAL		
Design	<p><b><u>Location, Description of the site, Policy context</u></b></p> <p>The site location is in the centre of the borough, to the south-east of Wood Green, north-east of Green Lanes and west of Tottenham. It is a Designated site in the council’s emerging Site Allocations DPD (pre-submission 2016), as SA60. The allocation reads:</p> <p><i>“Subject to reprovision of the existing nursery &amp; day centre uses, redevelopment for residential”.</i></p> <p>Requirements are that no buildings need be retained, but existing uses be reprovided, justify and mitigate any use of or impact on Metropolitan Open Land (MOL) and provide cycle and pedestrian access from the park to the south-west of the site, as well as guidelines that heights should be reduced in the east of the site to respect the amenity of the properties on Keston Road, the neighbouring Downhills Park should be respected and not have on it a detrimental effect, groundwater should be protected, piling should be with care and given that the present Keston Centre building is considered to have some heritage significance, retention of this building as part of a wider development could be considered.</p> <p>The site is roughly rectangular in shape, with Downhills Park, a 12hectare Green Flag award winning public park, adjoining to its north and west; boundaries of the site with the park are a mixture of different forms inducing wrought iron, concrete plank, close board timber and</p>	

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	<p>chain link fencing, with undergrowth and trees. The short southern boundary backs onto a primary school, the Harris Primary Academy Philip Lane (formerly Downhills Primary), including an emergency access gate and a 2 storey 1950s classroom block right on the boundary (with windows looking onto the site). However, all the school's public access is from its south, where it fronts West Green, the historic triangular shaped public open space at the junction of West Green Road and Philip Lane.</p> <p>The eastern boundary of the site is onto the back gardens of 2 storey terraced houses fronting Keston Road, a quiet residential street running north south. The only existing and only possible access into the application site (apart from the potential for pedestrian and cycle access from the park) is from the northern end of this terrace, via a narrow lane off the corner where Keston Road turns east. Keston Road then joins Downhills Park Road, a wider and busier local distributor street, which connects with Philip Lane southbound and continues northwards around two sides of the park to connect with Downhills Way. However Downhills Park Road is also a residential street lined with 2 storey terraced houses, as are all the streets between and for a considerable distance beyond, in an east, north-east and south-easterly direction.</p> <p>The location of the site is in a residential area, but as noted, it is a short distance from both West Green Road and Philip Lane, both busier roads with a mixture of residential and local amenities including shops. They</p>	

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	<p>also form the main east-west connection between the central north-south “spine” of the borough, along Green Lanes / Wood Green High Road &amp; related Piccadilly Line, and the eastern “spine” along Tottenham High Road and parallel Overground line. These are also the nearest Town / District Centres; Seven Sisters and Bruce Grove in Tottenham and Green Lanes and Wood Green (the latter a Metropolitan Centre) in the centre of the borough. West Green, the public open space at the point on West Green Road closest to the application site, forms a local centre and “breathing point” at approximately the midpoint between these spines, the point Phillip Lane splits off from West Green Road and continues east parallel and to the north of West Green Road. A more significant local centre stretches along West Green Road west of the green, and a notional and planned stronger north–south “green-chain” will cross West Green Road here.</p> <p>The Green Chain is an ambitious plan to eventually form a coherent, longer distance, pleasant, largely traffic free, pedestrian and cycle route north-south across the borough, mid way between those busy spines mentioned above. However it is very clearly present now within Downhills Park, which is most strongly characterised by the strong tree lined north-south avenue. This divides the park into a more hilly, enclosed, eastern half landscaped with different “rooms” for ornamental landscaping or enclosed sport pitches (such as tennis and basketball), whereas the western half is much more open, containing extensive sports pitches and mown and natural grassland. The avenue between these forms the</p>	

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	<p>main gateway to the park of West Green at its southern end and links northwards, across Downhills Park Road, to Lordship Rec., another large public park further north.</p> <p>Apart from the Site Allocation, the site itself does not have any planning designations, but the adjacent Downhills Park has the following planning designations in the London Plan (2015) and Haringey's adopted (2013) and emerging revised (pre-submission 2016) Local Plan Strategic Policies and emerging Development Management Policies (pre-submission 2016):</p> <ul style="list-style-type: none"> <li>a) It is Metropolitan Open Land (MOL); London Plan Policy 7.17 &amp; Haringey's SP13 (SP=Strategic Policies);</li> <li>b) Historic Park; SP13;</li> <li>c) A Site of Importance for Nature Conservation (SINC), albeit at the lowest level of importance, Local Importance; also SP13; and</li> <li>d) Proposed Green Grid; DM20 (Development Management Policies) and in the emerging revised SP13.</li> </ul> <p>There is also a designated Area of Archaeological Importance; SP12; nearby, covering West Green itself and some adjacent sites including parts of the school to the south of this site and the park to the south-west. There are designated Local Shopping Centres on West Green Road and Philip Lane about 200m south-west &amp; south-east of the site.</p> <p><b><u>Use, Form &amp; Development Pattern</u></b> The site is well located and suitable for residential</p>	

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	<p>development. It immediately adjoins residential streets and is very close to amenities, with a park immediately adjacent and shops and services within a short walking distance. The proposals are predominantly residential but also include a substantial new-build community use building, in accordance with the Site Allocation and Policy requirement to replace existing community uses. The mix of uses proposed is therefore appropriate.</p> <p>The key formal move is the creation of a new north-south street parallel to Keston Road. This allows a series of short terraces of townhouses between the new road and the back gardens of the neighbouring existing houses, of a similar scale and form to those neighbouring houses, with back gardens facing onto those back gardens. These are counterpoised on the west side of the new street with the row of mansion blocks of a scale more commensurate with the wide open spaces of Downhills Park. This is in my view an excellent clear and legible form of development.</p> <p>The success of this clear and robust, formal layout will partly depend on being well connected into existing networks of streets and public spaces, and on having well designed, robust and clearly laid out destinations, of sufficient interest at either end. In this, the proposals inevitably struggle to cope with having to connect to the existing street network solely via the existing narrow and convoluted lane access. However the proposals, with a modest widening of the lane leading into a distinct and elegant “entrance square”, forming a coherent transition to the new street, and populated, overlooked and</p>	

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	<p>addressed by the main entrance facades of the community building and Block D. This latter is a 3 storey flatted block that forms a transition in scale and form between the townhouses and mansion blocks as well as “closing” the end of the terrace of townhouses and turning the corner from the new street into the entrance square.</p> <p>The separate, stand-alone, purpose built community building to house the proposed community uses includes a nursery on the ground floor and community centre, with rooms for hire on the 1<sup>st</sup> floor. It presents a formal entrance facade to the square, reinforcing its entrance status and I am confident would successfully accommodate its community uses. Of these, the ground floor nursery use is especially reinforced with the provision of private open space to the side (covered) and rear, associated with the park, and with the canopy to the covered outdoor area on its side extending to form a partially secluded and covered nursery entrance area.</p> <p>The destination at the other end of the street is expected to be the more park-like space where this opens out and connects to Downhills Park itself. This expands out of the landscaped “wedge” that gradually appears along the new street, which is wedge shaped in plan, widening out as it descends the hill southwards, into the “garden square” at the southern end. Crucially the garden square contains a gateway into Downhills Park, although a second gateway has been added off the entrance square, in response to comments that neighbouring local residents would be more likely to be attracted to use this</p>	

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	<p>as an entrance to the park if it were at the northern end. However I am hopeful that residents of this new development will use the southern park gate regularly as it will provide the best, most direct route from their homes, via the park, to the amenities and public transport connections of West Green Road.</p> <p><b><u>Height, Bulk &amp; Massing</u></b></p> <p>The three mansion blocks form the boldest, bulkiest, most massive, highest and most visible part of the development, but in comparison with many similar developments in parkside locations they are modest. Two blocks are of four storeys, with a small 5<sup>th</sup> storey roof access stair element, the third block has a full, albeit setback, 5<sup>th</sup> floor. Their appearance will be of a consistent four storeys, with graded elevational treatment (see below) of a type found typically and widely in London; it will also be of an appropriate height to mark the edge of the park, forming some sense of enclosure to its wide open spaces and sitting in proportion to the mature trees of the park. The mansion blocks length and width gives them an appropriate proportion, wider seen in long views across the park and up and down the street, narrower from the squares at either end of the site and from the tight passageways between the blocks.</p> <p>The height of the townhouses steps down from 2 storeys plus a 3<sup>rd</sup> floor “attic” mansard roof with dormer windows, along the new street frontage to one storey onto their back gardens, with a mono-pitched roof. This mediates between the height of the existing neighbouring terraced houses and the proposed mansion blocks in the</p>	

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	<p>development, on the other, western side of the new street. The townhouses are grouped into short terraces of four, with small gaps between, giving those short terraces a sense of proportion similar to the mansion blocks, scaling the view of them down the street and across the park-square at the southern end of the site and allowing glimpses through to the houses and garden trees beyond.</p> <p>Block D, the smaller flatted block mediates between the scale and massing of the mansion blocks and townhouses, as well as helps defining the northern, entrance square and defining a gateway into the street. At three storeys it steps up from the 2 ½ storey elevation height (2 storeys plus a 3rd storey in the roof) of the townhouses, but like the mansion blocks with a flat roof, albeit with no set back additional floor. Divided into two different materials, its longer elevation responds to the longer proportions of the street facing elevations of the mansion blocks and townhouses, whilst it turns the corner in a squarer proportioned block responding to the proportions of the end elevation of the mansion blocks and to the more static nature of the entrance square.</p> <p>The more modest height, bulk and massing of the nursery / community block responds to its more intimate functions and the intimate space of the entrance square. In its plan form it continues and terminates the line of mansion blocks, whilst its stepped down height gives it a more relaxed, pavilion like massing.</p> <p><b>Legibility of the street layout, Approach to the front</b></p>	



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	<p><b><u>door(s) &amp; Accessibility</u></b></p> <p>The street network is as noted above a simple diagram; an entrance square, a street, and a termination square (accessing the park). Further distinction is created by paving the entrance square in consistent, quality pavements across vehicle and pedestrian areas. Further definition is created by running 5no. notional crossings across the street, at the entrance and lining up with the mansion block entrances and paths between the blocks. Further richness is created by varying the roadway paving in line with the mansion blocks, with bound gravel in front of the northern and southern blocks (A &amp; C) and paving to match the square in front of the middle block (B). Finally the southern square is a more landscaped, green and vegetated paved space.</p> <p>The new street forms the main organising approach for entrances to the new homes. All the new townhouses have a front door opening directly off this street, via a small margin of landscaped defensible space. All the mansion blocks have a single, grander, identifiable front door, also with defensible landscaped space between it and the road, and identifiably similar to, if scaled up from, the townhouses. Block D and the Community Centre / Nursery, are accessed off the entrance square.</p> <p>As much as possible, the street spaces and squares are treated as a uniform, shared surface, but notional vehicular and pedestrian zones are clearly demarcated with paving patterns and flush kerbs, and with obstacles to protect pedestrian safety. Near flush kerbs to pavements and flush thresholds to buildings provide</p>	

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	<p>access throughout for wheelchair users as well as visual and tactile clues for the visually impaired.</p> <p><b><u>Dwelling Mix and Block(s) Layout</u></b>            Inevitably the dwelling mix amongst the apartments is all of 1 and 2 bedroom units, with a strong bias to 1 bed units, as that is the developer's primary product. However the townhouses are all of 3 bedrooms, which significantly redress the balance. The Pocket product is of smaller flats to permit affordability. That the development is not <i>all</i> Pocket homes ensures a sustainable mix.</p> <p>All the flatted blocks and townhouses are essentially laid out east to west, to optimise aspect. There are no north or south facing single aspect units, although as the mansion blocks are laid out in a simple but efficient layout with a central corridor and 7, 8 or 9 flats per floor (in blocks C, B &amp; A respectively, &amp; on the upper floors; some flats are replaced with services on the ground floors), there are inevitably three, four or five flats per floor (42 in total) that are east and west facing single aspect, but that is an acceptable direction to have single aspect, and they all get a good, interesting outlook, either onto the lively street or bucolic park. In addition there are two ground floor single aspect flats per mansion block one in Block C) facing onto the street, but these are protected with generous defensive landscaping.</p> <p>Block D has a better flatted layout in terms of avoiding single aspect flats; there are none. There are however</p>	

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	<p>ground floor flats directly beside the street, with less defensible landscaping. Their only window facing the other way, onto the entrance court and beneath the access decks to the upper floor flats, is a kitchen window. However as they benefit from this alternate view, the potential of cross ventilation and use of a private outdoor courtyard space.</p> <p><b><u>Residential Design Standards &amp; Internal Layout(s)</u></b>  All flat layouts meet Mayors Housing SPG space and layout standards. The Pocket Homes one bedroom flats meet the special dispensation for one bedroom, one person homes with a shower room.</p> <p>Pocket Homes flats do not have their own private outdoor amenity space, but do benefit from “Juliette” balconies as well as private communal roof terraces in each block (courtyard in Block D), as well as the huge existing public park and additional public amenity spaces provided as part of this development on their very doorstep. However two bedroom Pocket Home flats do have their own private balcony; inset into the elevations to give residents some privacy, yet benefiting from southerly aspect (in Block C), or a view into the entrance square (in Block D).</p> <p>Servicing of houses and flats, for refuse, is simply arranged from the street through the site, which is suitable for a refuse lorry, including turning. However it is notable and impressive that refuse storage, along with cycle storage, is located unobtrusively around the backs of blocks, accessed via the paths between the mansion</p>	

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	<p>blocks and short terraces of townhouses, the latter being gated and lockable. The locations of cycle stores for the mansion blocks mask the refuse stores from adjacent flats and from the park.</p> <p><b><u>Daylight, Sunlight, Overshadowing, Privacy &amp; Overlooking</u></b></p> <p>The applicants have both provided Daylight Sunlight and Overshadowing Reports on their respective sites, prepared in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (2<sup>nd</sup> Edition, Littlefair, 2011)<sup>1</sup>.</p> <p>The reports show that no part of the proposed development would have a significant, noticeable effect on existing neighbouring dwellings. Regarding daylight, for all the existing windows to neighbouring residential dwellings pass the first test recommended by the BRE Guide; the 25° section line. Some windows in the existing neighbouring school building close to the southern boundary of the site fail this test but pass the second test recommended in the BRE Guide, the Vertical Sky Component (VSC). All existing neighbouring windows with an expectation of receiving sunlight (as defined by the BRE Guide) are amongst those that pass the section line test, which shows they would also continue to receive adequate sunlight. Existing neighbouring amenity spaces that could be</p>	

<sup>1</sup> Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (2nd Edition, Littlefair, 2011)

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	<p>overshadowed by the proposal (all gardens of neighbouring houses) are also shown to receive sufficient sunlight.</p> <p>The report shows that an overwhelming majority of habitable rooms in the proposed development would receive sufficient daylight, and of those that have a reasonable expectation of sunlight (that face within 90° due south), sufficient sunlight. Some rooms in the ground and first floor of the mansion blocks where they face the park would not receive sufficient daylight (but would receive sufficient sunlight). The applicants' consultants assess that this is due to the presence of existing trees in the park, and note that in winter months when they are not in leaf the daylight levels would nearly (but not quite) pass. Their comment is that as the neighbouring trees are deciduous daylight levels will vary and by best in winter when better daylight is most values. I would comment that a fail is still a fail, but that it is unreasonable to expect full compliance with the Guide (which states it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations) in London, as the Mayor of London's Housing SPG acknowledges. But to me the key mitigation is that these rooms benefit from an outlook directly onto a park, with mature trees, that may restrict daylight but surely benefit outlook. Finally the applicants' consultants assessed sunlight to proposed public and private amenity space within the proposed development and found that all such spaces would receive adequate sunlight as defined by the BRE Guide. I have checked the applicants' consultants report</p>	

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	<p>and agree their methods are correct and the results appear sound.</p> <p>The proposals are designed to carefully avoid overlooking of neighbouring properties and loss of their privacy, or of privacy of residents of the proposals from existing neighbouring properties. In particular, along the majority of the eastern boundary, where the site backs onto the short back gardens of existing terraced houses on Keston Road, many of which have large 1<sup>st</sup> floor bay windows looking directly at the site, the proposal is for nearly continuous terraces of townhouses that only have ground floor windows to their rear; these will be below garden wall level and therefore not cause any overlooking, and their upper floors is a mono-pitched roof to their rear, with only occasional rooflights set above eye level providing only views of the sky from within the proposed houses. However I am concerned there may be some overlooking <i>of the proposed houses from the existing neighbours.</i></p> <p>Towards the northern end of the eastern boundary of the site, the neighbouring houses on Keston Road strep further away from the boundary and have longer back gardens. Here the proposal includes the small, 3 storey flatted block. Although further away from existing neighbouring dwellings than further south, it is designed nevertheless to minimise its impact on those houses, with only kitchen windows and access decks on that side of the block, the rest of these flats' windows facing west over the street. Nevertheless the distance of this access decks of this block from the windows of the nearest</p>	

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	<p>neighbouring houses is an acceptable distance of about 25m.</p> <p>Between dwellings in the development, the blocks look at each other across the street. This would not normally be a concern, as people have less expectation of privacy from rooms facing a street, but many of these flats are single aspect, and the townhouses' bedrooms all look onto the street. However the street width is a reasonably generous 15m at its northern end, widening out to 26m at the southern end, so that in the majority of the site they will be more than the 18m apart where research shows faces cannot be recognised, the normal benchmark for minimum privacy distance.</p> <p><b><u>Elevational Treatment &amp; Fenestration</u></b>  Elevations to all blocks are notably carefully composed with regular spacing of similar sized windows giving a basic sense of order, within which variation and gradation mark individuality and distinguish height. Townhouses are grouped into short terraces of four but are nonetheless clearly distinguishable as individual units, their elevations simple orderly and with a vertical emphasis of proportion. The mansard roof provides a capping to the two storey main elevation and a familiar sense of proportion of the classic London terraced house, found in many surrounding streets.</p> <p>The corner block, Block D, forms a termination to the townhouses and a step up in scale whilst maintaining a regularity and sense of order part of the piece with the rest of the developments; in particular the ground floor is</p>	

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	<p>treated as a base with a separating brick and stone band, upper floor windows sitting in slightly recessed two storey brick bays and the long side of the block is split vertically into two elevations, in different colour brick, matching the alternating brick used elsewhere, and responding to the different nature of the street and square.</p> <p>The three mansion blocks are the most strikingly composed, with a clearly distinguished base (ground floor), middle (1<sup>st</sup> &amp; 2<sup>nd</sup>) with two storey recessed bays, top (3<sup>rd</sup> floor) with single storey recesses and where present (Block C only except for roof access) set back attic. Vertically, windows are paired to distinguish the flats, and alternation of the presence or not of Juliette balconies. The entrances and stair cores are expressed on the street facing elevations as a central recessed element, marking their entrance and breaking in two their longer elevation, with a matching bay on the opposing, park side, subtly also marked with a slight recess and no window recess. Fenestration to ground floor flats is of larger, full width floor to ceiling windows between heavier looking brick piers.</p> <p>Finally the Nursery / Community Building, is in a contrasting architectural style (and by different architects) and yet clearly of the same family of buildings; its two storeys fenestrated in a regular pattern of square windows or recesses, yet finished in contrasting, monolithic materials.</p> <p><b>Landscaping</b></p>	



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	<p>The landscaping plan supports the overall layout and concept of the development, the transition and bounding of the park to the residential neighbourhood, with landscaping to the west of the site, adjacent to the park, more lush, green and verdant, to the east, a more hard paved street.</p> <p>Hard landscaping is described above in the section on the legibility of the street layout. Careful thought has been given to paving materials, to be durable and compliment the proposed housing, community building and context, although these will have to be secured by condition.</p> <p>Street trees are proposed to be used carefully to frame parking areas, entrances to blocks and animate the two squares, whilst subtly screening pedestrians from motorists. Planting beds to provide defensible space are of consistent depth in front of the townhouses and Block D; they start at the same depth in front of the mansion blocks but exploiting the splay in the site, expand out giving the flats greater and greater defensible space, becoming wide enough for a swale for rainwater control and verdant landscaping eventually opening our into the garden square at the southern end where fruit trees provide a landscaped leisure area. Some of the parking spaces are proposed to be filled with planting beds; these could be removed if parking demand increases, or if as the developer and architects expect, parking demand is low, further planting beds could be provided.</p> <p><b>Materials &amp; Details</b></p>	

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	<p>The materials palette to all the housing blocks, whether mansion blocks or townhouses, is predominantly brick, which is appropriate as a durable, robust material that weathers well, as well as being established by precedent from local context. Two complimentary bricks are proposed, to reinforce the architectural concept, with the three mansion blocks in a lighter, tan coloured London Stock brick, and the townhouses and Block D alternating between that brick and a redder brick. Contrasting elements such as horizontal bands and recessed entrance / stair panels are in GRC reconstituted stone.</p> <p>The contrasting Community Use / Nursery Building is proposed to be in a lightweight fibreglass rainscreen cladding system, with a steel clad wall and fibreglass canopy marking the nursery entrance. The green-grey slightly translucent cladding will contrast with the brickwork housing and reference the park, pavilions and open space.</p> <p>Conditions will be required to secure quality materials and that their detailing is robust, particularly of choice of brick, cladding, balustrades, rainwater goods and other materials, and detailing of parapets, window reveals and around recessed balconies, including their soffits.</p> <p><b><u>Conclusions</u></b> As design officer I am satisfied that the necessary design quality has been achieved to permit the proposed mansion block form, height and visibility in this striking but sensitive, park-side location, and that the terraced townhouses and corner block will mediate in scale</p>	

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	<p>between the larger mansion blocks and existing neighbouring streets. Furthermore the community building/nursery will be a striking, bold and yet appropriate provision of modern social infrastructure. I am excited at the design of the entrance square, street, and garden square, which I am confident will provide a clear and attractive gateway and entrance to the community use/nursery building and the existing park, enhance the development's integration into its neighbourhood and provide a clear, legible approach to the proposed housing. I am also happy that the quality of residential accommodation will be high, and that the relationship of the proposed development to the residential streets and public park contexts will be positive.</p>	
<p><b>Transportation</b></p>	<p>The site is located to the north of Phillip Lane and is bounded by Keston Road to the east, Downhills Park to the north, Keston Road to the west and the Harris Primary School to the south. The site currently has one vehicular access point on Keston Road and pedestrian and cycle access points from Downhills Park. Keston Road is a residential road and is heavily parked, the southern end of Keston Road has been stopped-up with cycle and pedestrian access only, hence vehicular access to Keston Road is only possible from the northern end via Downhills Park Road or Kirkstall Avenue via Downhills Park Road. The site is located in an area with a low public transport accessibility level (PTAL2), however the site is within walking distance of 5 bus routes 67, 41, 230, 341 and W4 bus routes, which offers some 57 buses per hour and provides good connectivity</p>	<p>Conditions and informatives are recommended as advised.</p>

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	<p>to Seven Sister Underground / rail station and Turnpike Lane bus and underground station. The site is currently not located in control parking zone, however the parking management team have recently conducted consultation of the area surrounding the site, resident's area in favour of some form on parking control mechanism to restrict parking in the area surrounding the site</p> <p><u>Description of Development:</u>  The site which includes the Keston Centre which is currently unoccupied, the Goan Community Centre, Haringey contact centre, and the West Green playgroup nursery, the applicant is proposing to demolish the existing building and redevelop the site to re-provide the D1 (nursery), C3 (residential units) containing 126 units ( 93x1 bed pocket apartment, 5x2 pocket apartments, 12x2 bed private apartments and 16x3 bed town house and 65); car parking spaces, landscaping and widening of the existing vehicular access to allow two cars to park.</p> <p><u>Trip Generation:</u>  The applicants transportation planning consultant Transport Planning Practice has conducted surveys of the existing site to measures the number of vehicular trips generated by the development between 7am and 7pm, the surveys identified that the nursery element of the development generated some 12 in/out trips during the PM peak period and 10 in/out trips during the PM peak period. The existing community centre did not generate any vehicular trips during the AM peak period and only 1 out vehicular trip during the AM peak period. The survey identified that a number of the vehicular trips</p>	

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	<p>generated by the existing site is as a result of vehicular movements generated by staff from the nearby Harris Primary Academy, with 10 in movements during the AM Peak hour and 9 vehicles out during the PM Peak hour. The parking by the school which has a maximum parking accumulation of some 23 cars at 15:45 is informal parking which has not been agreed by the land owner, in addition the school has a travel plan which seeks to promote travel by sustainable modes of transport to and from the site, which is in line with the Council's Local Plan Policy SP7 and the Council's Development Management DMP Policy DM32.</p> <p>The applicant has provided trip generation information based on the following sites (Stanley Close, Watson House and Havilland House, Sewarstone House and Swainson Road) from the TRICS/TRAVL trip forecast database, which predicted that the proposed residential development would generate 93 in/out person's trips during the AM peak hour and 85 in/out trips during the PM peak hours. This translates to 12 in/out vehicular trips during the AM peak hour and 19 in/out vehicular trips during the PM peak hour. The applicant transport consultant have used method of travel to work modal split data from the 2011 census data for the super output area (Haringey 013B) in which the site is located. The sustainable transport modal split target based on the travel to work modal split data forecast that the majority of the trips will be by sustainable modes of transport (87%), with only some 13% of trips to work by car drivers.</p>	

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	<p><u>Pedestrian Access:</u>  The proposed development will have some 70 in/out walking trips during the AM peak hour and 57 In/out pedestrian trips during the PM peak hour, the development proposal will increase the permeability, to Downhills Park, which links into West Green Road. The vehicular and pedestrian access from the site Keston Road will be improved to a wider carriageway and improved site lines to improve pedestrian safety. The units within the development will be access via the central landscaped accessed road, the community facility will be accessed via the new community square will also provide parking and collection and drop off spaces for the nursery. The applicant has provided vehicle swept path analysis to demonstrate that large service vehicles can manoeuvre through the proposed landscaping whilst maintaining pedestrian safety.</p> <p><u>Parking Provision:</u>  The applicant has submitted car parking surveys as part of the Transport Assessment, the surveys were conducted on Wednesday 6th July 2016, and 9th July 2016, the surveys included an overnight survey which is when the majority of residents are at home and the parking pressures are at the highest. The results of the car parking surveys using 6 metres as a car length concluded that the area surrounding the site is suffering from high car parking pressures. The applicant is proposing to provide 16 car parking spaces for the 16 town house and 12 car parking space for the 12 private apartments; the remainder of the pocket units ( 98 units) excluding the 8 wheel car accessible unit which will each</p>	

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	<p>have 1 allocated car parking will have a car parking provision of 0.2 car parking space per unit (18 car parking space ); 9 car parking spaces including 2 drop off car parking spaces will be provided for the nursery and community centre element of the development and 2 car club spaces. In summary the residential aspect of the development will have a car parking provision of 0.42 car parking space per unit. We have considered that as the Council's parking standard for this area is maximum and the parking provision is in line with the 2011 census data, 56.6% of households not owning a car and an average car ownership of 0.53 per household for the West Green Ward. Considering that a larger percentage of the total number of units proposed are 1 bed units, 98 of the 126 units (78%), the car parking provision is considered appropriate. We will require the applicant to provide parking management plan byway of condition which must include details on the allocation of car parking to the residential aspect of the development. The plan must also include details on how parking will be controlled on site to ensure that residents and visitors don't park in car parking spaces allocated to the nursery and community centre.</p> <p><u>Access and Servicing Arrangements:</u> The main vehicular access to the development will be via the enhanced vehicular access from Keston Road, the access will be widened by 1 metre to allow for two-way vehicular movements, the access to the site will require reconstruction, these works have been estimated at £20.708 and will be secured by way of a S.278 agreement, as per Drawing KR/GA/001.</p>	

Stakeholder	Question/Comment	Response
	<p><u>Travel Plan:</u> The applicant will be required to submit a draft travel plan before the development is occupied and the full travel plan no later than 6 months after the development has been occupied. The travel plan must include measures to maximum the use of public transport to and from the site include car clubs, public transport information. The travel plan must be prepared in line with the TfL Travel Plan Best Practice Guidance and must be assessed using TfL attribute.</p> <p><u>Highways layout:</u> The proposed scheme will be require very limited alterations to the public highways with only alteration to the access on Keston Road in the form of a raised entry treatment, the cost of these works have been estimated at £20,708 the applicant will be required to pay the cost of these works byway of a S.278 agreement in line with the Drawings.</p> <p>On reviewing the application and supporting documentation the transportation and highways authority would not object this application subject the following S.106 obligations and conditions:</p> <p><b>S106 Obligations:</b> 1. The applicant will be required to enter into a Section 278 Agreement to secure a sum of £20,708 (twenty thousand seven hundred and eight pounds) for works related to the removal of the existing vehicular access point and the re-creation of a new vehicular access point</p>	



Stakeholder	Question/Comment	Response
	<p>into the site, construction of a raised tables and resurfacing of the footways sites side.</p> <p>Reason: To improve pedestrian/cycle road safety in the immediate vicinity of this development,</p> <p>2. The applicant enters into a S.106 agreement including provision that no residents within the proposed development will be entitled to apply for a resident's parking permit under the terms of any current or subsequent Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development.</p> <p>Reason: To mitigate the parking demand generated by this development proposal on the local highways network by constraining car ownership and subsequent trips generated by car, resulting in increase travel by sustainable modes of transport hence reducing the congestion on the local highways network.</p> <p>3. The applicant shall be required to enter into a Section 106 Agreement securing a £40,000 (forty thousand pounds) contributions towards investigations for the feasibility of a new controlled parking zone.</p> <p>Reason: To encourage the use of sustainable modes of transport and to minimise the impact of the development upon on-street parking within the vicinity of the site.</p> <p>4. A residential and commercial travel plan must be secured by the S.106 agreement. As part of the detailed travel plan the flowing measures must be included in</p>	

Stakeholder	Question/Comment	Response
	<p>order to maximise the use of public transport:</p> <p>a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Facility Management Team to monitor the travel plan initiatives annually.</p> <p>b) Provision of welcome induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and time-tables to all new residents.</p> <p>c) Establishment or operation of a car club scheme, which includes at least 3 cars spaces. The developer must offer two years free membership and £50 credit to all new residents.</p> <p>d) The applicant's are required to pay a sum of, £3,000 (three thousand pounds) per travel plan for monitoring of the travel plan initiatives.</p> <p>Reason: To minimise the traffic impact generated by this development on the adjoining roads, and to promote travel by sustainable modes of transport.</p> <p><b>Conditions:</b></p> <p>1. The applicant will be required to provide a parking management plan which must include details on the allocation of car parking to the residential aspect of the development the plan must also include details on how parking will be controlled on site to ensure that residents and visitors don't park in car parking spaces allocated to the nursery and community centre.</p> <p>Reason: To ensure that car parking spaces area allocated to various units as required, and to ensure that</p>	

Stakeholder	Question/Comment	Response
	<p>on site car parking is managed to ensure that residents do not park in the car parking spaces allocated for the community centre. The plan must also ensure that allocated residents car parking spaces are kept free for allocated residents only.</p> <p>2. The applicant/developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval prior to construction work commencing on site. The Plans should provide details on how construction work (including demolition) would be undertaken in a manner that disruption to traffic and pedestrians on Keston Road and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and co-ordinated to avoid the AM and PM peak periods.</p> <p>Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation and highways network.</p> <p>3. The applicant/operator is required to submit a Service and Delivery Plan (SDP) for the local authority's approval prior to occupancy of the proposed development. The Plans should provide details on how servicing and deliveries will take place. It is also requested that servicing and deliveries should be carefully planned and co-ordinated to avoid the AM and PM peak periods.</p> <p>Reason: To reduce traffic and congestion on the transportation and highways network.</p>	

Stakeholder	Question/Comment	Response
	<p><b>Informative:</b> The new development will require naming. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.</p>	
<b>Pollution Control</b>	<p><b>Air Quality</b></p> <p>The proposals for the development include 65 parking spaces for a total of 126 residential units.</p> <p>The London Plan, Policy 7.14 states that new development should:</p> <ul style="list-style-type: none"> <li>• minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans</li> <li>• promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;</li> <li>• Be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas</li> </ul>	Conditions recommended as advised.

Stakeholder	Question/Comment	Response
	<p>(AQMAs)).</p> <ul style="list-style-type: none"> <li>• Ensure that where provision needs to be made to reduce emissions from a development, this is usually made onsite.</li> </ul> <p>An Air Quality Assessment by XCO2 energy dated September 2016 has been submitted. This shows that the ‘development emissions for NO2 and PM10 are higher than the benchmarks, therefore the proposed development is not Air Quality Neutral with respect to transport-related emissions.’ Therefore mitigation on site must be provided. This should include:</p> <ul style="list-style-type: none"> <li>• Low emission car club spaces;</li> <li>• electric vehicle charging points;</li> <li>• a service delivery plan;</li> <li>• minimising emissions from combustion plant by selecting boilers and CHP with low emissions as possible.</li> </ul> <p>The energy statement proposes a centralised system incorporating CHP and backup gas boilers that will supply both space heating and domestic hot water for the main residential blocks. However no information on the provision of heat and hot water for the D1 uses is included. The AQ assessment states that the technical specification of the proposed units has not yet been finalised and that detailed dispersion modelling will be undertaken at developed design stage to determine the potential impact of the energy centre emissions on future occupants of the proposed development and existing</p>	

Stakeholder	Question/Comment	Response
	<p>sensitive receptors in the area.</p> <p><b>Contaminated Land</b></p> <p>A Preliminary Risk Assessment (RSK project 325021 R01 (01)) dated September 2016 has been submitted. This presents amongst other issues a preliminary conceptual site model of contamination, identifying possible pollutant linkages. The conceptual model indicates potential pollutant linkages with a risk of low to medium from the potential historical use of heating oil, made ground and off- site former railway land.</p> <p>The report recommends that that an intrusive investigation should be conducted including:</p> <ul style="list-style-type: none"> <li>• Excavation of trial pits, focused on proposed garden areas and areas surrounding the former school and confirming thickness of made ground;</li> <li>• Laboratory testing of soil samples (groundwater is not expect to be encountered);</li> <li>• Interpretative report in relation to a proposed residential redevelopment.</li> </ul> <p><b>Recommended conditions:</b></p> <p><u>Combustion and Energy Plant:</u></p> <p>Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 20 mg/kWh.</p>	

Stakeholder	Question/Comment	Response
	<p>Reason: To protect local air quality</p> <p>Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA. This shall include detailed dispersion modelling, of all combustion plant, as recommended in Air Quality Assessment XCO2 energy dated September 2016.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.</p> <p><u>Contaminated land: (CON1 &amp; CON2)</u></p> <p>1. Before development commences other than for investigative work:</p> <p>a) Using information obtained from the RSK Preliminary Risk Assessment an additional site investigation, sampling and analysis shall be undertaken. The investigation must be comprehensive enough to enable:</p> <ul style="list-style-type: none"> <li>▪ a risk assessment to be undertaken,</li> <li>▪ refinement of the Conceptual Model, and</li> <li>▪ the development of a Method Statement detailing the remediation requirements.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.</p> <p>b) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p> <p>2. Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.</p> <p><u>Management and Control of Dust:</u></p> <p>1. No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.</p> <p>2. Prior to the commencement of any works the site or</p>	



Stakeholder	Question/Comment	Response
	<p>Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.</p> <p>3. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <a href="http://nrmm.london/">http://nrmm.london/</a>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.</p> <p>4. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.</p> <p><b><u>As an informative:</u></b></p> <p>Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in</p>	

Stakeholder	Question/Comment	Response
	accordance with the correct procedure prior to any demolition or construction works carried out.	
<b>Waste Management</b>	<p>The proposal will require the following:</p> <p>21 x 1100L Euro bin for refuse  13 x 1100L Euro bin for recycling  126 x Kitchen Caddy  9 x 140L Food waste bin</p> <p>The commercial premise must ensure that they have a separate waste collection service in place and that it is not mixed with the residential waste. The business owner will need to ensure that they have a cleansing schedule in place and that all waste is contained at all times.</p> <p>Commercial Businesses must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</p> <p>At present the information provided does not state how far the pulling distance is from the storage points to the pickup point. (A management plan can be put in place by the managing agent if needed to ensure receptacles are placed within pulling distance and returned to storage</p>	Concerns raised can be addressed via the imposition of conditions.

Stakeholder	Question/Comment	Response
	<p>area after collection if needed)</p> <p>Vehicle tracking information will need to be supplied to ensure that waste vehicle can enter site and must have a point in which to turn.</p> <p>All guidelines above and below should be followed and confirmation be provided.</p>	
<b>Sustainability</b>	<p><b><u>Energy – Overall</u></b>  The scheme delivers a 35.8% improvement beyond Building Regulations 2013. The policy requirement is 35% improvement beyond Building Regulations 2013. However, the overall approach is not policy compliant because the London Plan energy hierarchy has not been followed.</p> <p><b><u>Energy – Lean</u></b>  The applicant has proposed an improvement of beyond Building Regulations by 35.8% through improved energy efficiency standards in key elements of the build. While this is not best practice it is policy compliant and a positive.</p> <p>This should be conditioned to be delivered on site:</p> <p><b><u>Suggested Condition:</u></b></p> <p>You must deliver the energy efficiency standards (the Lean) as set out in the Energy Strategy, by XC02 Energy, Issue 02, dated 26 September 2016.</p>	<p>Concerns are noted, but can be overcome by conditions recommended as detailed.</p>

Stakeholder	Question/Comment	Response
	<p>The development shall then be constructed and deliver the U-values set out in this document. Achieving the agreed carbon reduction of 35.8% beyond BR 2013. Confirmation that these energy efficiency standards and carbon reduction targets have been achieved must be submitted to the local authority at least 6 months of completion on site for approval. This report will show emissions figures at design stage to demonstrate building regulations compliance, and then report against the constructed building. The applicant must allow for site access if required to verify measures have been installed.</p> <p>If the targets are not achieved on site through energy measures as set out in the afore mentioned strategy, then any shortfall should be offset at the cost of £1,800 per tonne of carbon plus a 10% management fee.</p> <p>Reason: To comply with London Plan Policy 5.2. and local plan policy SP04</p> <p><b><u>Energy – Clean</u></b></p> <p>The scheme proposes a single energy centre serving all flatted units, and stand alone boilers for the houses and the community centre.</p> <p>There are no details of how the single energy centre proposed will interlink to all flatted units, houses or the community centre. There are no details of how this single energy centre will be designed (through reserved space and basement wall plugs) to connect to a local network at a later date.</p>	

Stakeholder	Question/Comment	Response
	<p>Therefore based on these issues, at this stage the clean energy proposals are not policy compliant. We recommend that these are addressed through the following condition:</p> <p><u>Suggested Condition for CHP and boiler facility:</u></p> <p>You shall submit details of the site CHP and boiler facility and associated infrastructure, which will serve heat and hot water loads for all the flatted units, houses and community centre on the site.</p> <p>This shall be submitted to and approved in writing by the Local Planning Authority 3 months prior to any works commencing on site. The details shall include:</p> <ul style="list-style-type: none"> <li>a) location of the single energy centre which is sized for all required plant;</li> <li>b) specification of equipment (including thermal storage, number of boilers and floor plan of the plant room);</li> <li>c) flue arrangement;</li> <li>d) operation/management strategy;</li> <li>e) the route and connections from the energy centre into all the dwellings and the community centre; and</li> <li>f) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link)</li> </ul> <p>The CHP and boiler facility and infrastructure shall be</p>	

Stakeholder	Question/Comment	Response
	<p>carried out strictly in accordance with the details so approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>Reason: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system in line with London Plan policy 5.7 and local plan SP04 and DM 22.</p> <p><u>Suggested Condition for individual boilers:</u></p> <p>That all combination gas boilers that are to be installed across the development are to have a minimum SEDBUK rating of 91%. The applicant will demonstrate compliance by supplying installation specification at least 3 months post construction. Once installed they shall be operated and maintained as such thereafter.</p> <p>Reason: To comply with London Plan Policy 5.2. and local plan policy SP04</p> <p><b><u>Energy – Green</u></b></p> <p>That application has reviewed the installation of various renewable technologies:</p> <p><b><i>PV Panels</i></b> - They have concluded that approximately 420m2 PV panels with 63kWp would produce regulated CO2 savings of approximately 18.0%. These are fitted onto roof space on the blocks, but not all roof space has been used for energy generation as the applicant wants</p>	

Stakeholder	Question/Comment	Response
	<p>roof terraces for the private flats.</p> <p><b>Air Source Heat Pumps</b> - Air source heat pumps (ASHPs) are being suggested to provide space heating and cooling in the Community Centre. This will generate a 1% carbon reduction across the site. There are no details on the cooling loads on the scheme. ASHP will be visually intrusive on the edge of the park.</p> <p>The policy requirement is to achieve a 20% carbon reduction through the use of renewable, the scheme proposes 19%. The ASHP can be removed if the building is designed passively and removes the requirement for cooling. Please refer to the London Plan Cooling Hierarchy.</p> <p>We do not support the use of the ASHP. We believe that the Community Centre should be connected to the site wide heating network, and that the building is designed to passively cool.</p> <p><u>Suggested condition:</u></p> <p>You will install the renewable energy technology (PV Solar Panels) as set out in the document Energy Strategy, by CalfordSeaden, dated September 2016.</p> <p>The applicant will deliver no less than 460m2 of solar PV panels.</p> <p>Should the agreed target not be able to be achieved on site through energy measures as set out in the afore</p>	

Stakeholder	Question/Comment	Response
	<p>mentioned strategy, then any shortfall should be offset at the cost of £1,800 per tonne of carbon plus a 10% management fee.</p> <p>The Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p>The equipment shall be maintained as such thereafter. Confirmation of the area of PV, location and kWp output must be submitted to the local authority at least 6 months of completion on site for approval and the applicant must allow for site access if required to verify delivery.</p> <p>Reason: To comply with London Plan Policy 5.7 and local plan policy SP04</p> <p><b><u>Sustainability Assessment</u></b></p> <p>The applicant has submitted a Sustainability Assessment within their Energy Strategy. They have proposed that the scheme undertakes a Home Quality Mark and achieves a level 3 outcome.</p> <p>This approach is policy compliant and supported, it should be conditioned.</p> <p><u>Suggested condition:</u></p> <p>You must deliver the sustainability assessment as set out in the Energy Strategy, by CalfordSeaden, dated</p>	



Stakeholder	Question/Comment	Response
	<p data-bbox="573 233 821 261">September 2016.</p> <p data-bbox="573 306 1377 630">The development shall then be constructed in strict accordance of the details so approved, and shall achieve the rating of Home Quality mark level 3 for all units on the site, and shall be maintained as such thereafter. A post construction certificate shall then be issued by an independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p data-bbox="573 675 1373 1029">In the event that the development fails to achieve the agreed rating for the whole development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the local authorities approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p data-bbox="573 1075 1335 1216">Reasons: In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) policies 5.1, 5.2, 5.3 and 5.9 and policy SP04 of the Local Plan.</p> <p data-bbox="573 1261 1346 1391"><b><u>Overheating Risk</u></b> The thermal model submitted shows that two units, the living room in the Town Houses, and the community centre are at risk from overheating in future weather</p>	

Stakeholder	Question/Comment	Response
	<p>patterns.</p> <p>To overcome this, the applicant has recommended the use of mechanical cooling and ventilation (air conditioning) and solar glazing. No further details are provided.</p> <p>While the risk to the dwellings may be acceptable, the overheating risk for the community centre and its future uses is not. This is therefore not policy compliant.</p> <p><u>Suggested Condition:</u></p> <p>To demonstrate that there is minimal risk of overheating, the results of dynamic thermal modelling (under London's future temperature projections) for all internal spaces will be given to the Council for approval. This should be submitted to and approved in writing by the Local Planning Authority 6 months prior to any works commencing on site and shall be operational prior to the first occupation of the development hereby approved.</p> <p>Details in this strategy will include measures that address the following :</p> <ul style="list-style-type: none"> <li>- the standard and the impact of the solar control glazing;</li> <li>- that the overheating units pipe work space is designed in to the building allow the retrofitting of cooling and ventilation.</li> <li>- that the community centre is designed to passively cool and not have an overheating risk. And that it is not reliant on mechanical cooling and ventilation.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>This model and report should include details of the design measures incorporated within the scheme (including details of the feasibility of using external solar shading and of maximising passive ventilation) to ensure adaptation to higher temperatures are included. Air Conditioning will not be supported unless exceptional justification is given.</p> <p>Once approved the development shall be carried out strictly in accordance with the details so approved, shall be maintained as such thereafter and no change there from shall take place without the prior written consent of the Local Planning Authority.</p> <p>Reason: London Plan Policy 5.9 and local policy SP04 and in the interest of adapting to climate change and to secure sustainable development.</p> <p><b><u>EV charge points</u></b> The Applicant has advised the 20% of spaces will be fitted with Active electric Vehicle Charging Points (ECVPS) with a further 20% passive provision as required by the London Plan.</p> <p><u>Suggested condition:</u></p> <p>Details and location of the parking spaces equipped with Active (20% of spaces) and Passive (20% of spaces) Electric Vehicle Charging Points (ECVPS) and the passive electric provision must be submitted 3 months prior to works commencing on site. The details shall</p>	

Stakeholder	Question/Comment	Response
	<p>include:</p> <ul style="list-style-type: none"> <li>- Location of active and passive charge points</li> <li>- Specification of charging equipment</li> <li>- Operation/management strategy</li> </ul> <p>Once these details are approved the Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p>Reason: To comply with London Plan Policy 6.13.</p>	
<b>Conservation</b>	<p>I have read the additional information submitted with the application: Heritage Statement and the Visual Impact assessment. My conclusions are as follows:</p> <p>I agree with the Heritage Statement's assessments in that it considers Keston Centre to have some historic and aesthetic value. This assessment, however, has not assessed the building's communal value derived from its use and function. In my opinion, the significance of the building is as follows:</p> <ul style="list-style-type: none"> <li>• <b>Historic value:</b> The historic value is derived from the building's architect G.E.T Laurence who worked on a number of projects for the London School Board in the Tottenham area. This value is limited as it is not one of his more influential works.</li> <li>• <b>Architectural value:</b> Its architectural value is derived from its layout and detailing such as the courtyard</li> </ul>	<p>A heritage recording condition is recommended as advised.</p>

Stakeholder	Question/Comment	Response
	<p>style plan form and the gabled brick elevations. This is limited too as the building's low scale and much simpler detailing do not impart enough quality to the building so it could be considered eligible for statutory or local listing.</p> <ul style="list-style-type: none"> <li> <b>Communal value:</b> The building is also considered to have some communal value derived from its use and function. Again, this use is historic to an extent as the building has been vacant for nearly two years. Additionally, the condition of the building is such that it would be difficult to convert it to adaptable modern uses without large scale works internally and externally which would also lead to loss of architectural integrity. </li> </ul> <p>Overall, whilst it is recognised that the building has some architectural and historic interest, it is limited due to the low scale of the building and the simpler architectural detailing. The building is neither listed, locally listed or within a conservation area where it makes a positive contribution. However, its historic association with G.E.T Laurence and communal value does warrant its recognition as a non-designated heritage asset. Demolition of such a building will therefore be considered to cause some harm. This harm has been considered as per NPPF 135 and it is felt that the design, form and layout of the proposed scheme is of a quality that will result in significant public benefit that would outweigh the harm. However, it would be advisable that if works for demolition are being permitted, a Level 3 recording based on Historic Building's guidance given in 'Understanding Historic Buildings: A Guide to Good</p>	

Stakeholder	Question/Comment	Response
	Recording Practice' (May 2016) is secured by condition so that the building's historic and communal value could be illustrated for future generations.	
<b>EXTERNAL</b>		
<b>Thames Water</b>	<p><b>Waste Comments</b></p> <p>Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</p> <p>Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties</p>	Conditions and informatives are recommended as suggested.

Stakeholder	Question/Comment	Response
	<p>suffering blocked drains, sewage flooding and pollution to local watercourses.</p> <p>There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit <a href="http://thameswater.co.uk/buildover">thameswater.co.uk/buildover</a></p> <p>No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p>	

Stakeholder	Question/Comment	Response
	<p>'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:wwqriskmanagement@thameswater.co.uk">wwqriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>."</p> <p>Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.</p> <p><b>Water Comments</b> On the basis of information provided, Thames Water</p>	



Stakeholder	Question/Comment	Response
	<p>would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.</p> <p>Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</p>	
<b>Designing Out Crime</b>	<p>I have previously been consulted on this scheme by the Architect and main Stakeholders and my comments and recommendations regarding layout have been included within the revised design. I maintain some concerns regarding the proposed access into Downhills Park from the new scheme. My opinion is that the site works better and is more secure as a cul-de-sac with one single entrance and exit via Keston Road. Introducing the extra route will increase permeability and could give anonymity to an offender, who can simply walk through the estate. The key issue will be managing this new route and who will actually be responsible for doing so.</p> <p>Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October 2015, it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards; I would encourage the planning authority to note the experience gained by</p>	<p>A condition is recommended to ensure the scheme achieves Secured by Design accreditation.</p>

Stakeholder	Question/Comment	Response
	<p>the UK police service over the past 26 years in this specific subject area.</p> <p>That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with specific aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.</p> <p>I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website <a href="http://www.securedbydesign.com">www.securedbydesign.com</a></p> <p>Having reviewed the application and available documentation we have taken into account Approved document Q and the design and layout there is no reason why, with continued consultation with a DOCO and the correct tested, accredited and third party certificated products that this development would not be able to achieve Secured by Design Gold award. I would</p>	

Stakeholder	Question/Comment	Response
	<p>therefore seek to have a planning condition submitted where this development must achieve Secured by Design accreditation.</p>	
<p><b>Natural England</b></p>	<p>Natural England's comments in relation to this application are provided in the following sections.</p> <p><i>Statutory nature conservation sites — no objection</i> Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.</p> <p><i>Protected species</i> We have not assessed this application and associated documents for impacts on protected species. Natural England has published <u>Standing Advice</u> on protected species.</p> <p>You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.</p> <p>The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.</p>	<p>Noted.</p>

Stakeholder	Question/Comment	Response
	<p>If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at <a href="mailto:consultationsnaturalengland.orq.uk">consultationsnaturalengland.orq.uk</a>.</p> <p>We would, in any event, expect the LPA to assess and consider the possible impacts resulting from this proposal on the following issues when determining this application:</p> <p><i>Green Infrastructure</i> The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. Natural England would encourage the incorporation of GI into this development.</p> <p><i>Local sites</i> If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.</p> <p><i>Biodiversity enhancements</i> This application may provide opportunities to incorporate</p>	

Stakeholder	Question/Comment	Response
	<p>features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.</p> <p><i>Sites of Special Scientific Interest Impact Risk Zones</i>  The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the <a href="http://data.gov.uk">data.gov.uk</a> website</p> <p><i>Follow-up comments:</i></p>	

Stakeholder	Question/Comment	Response
	<p>Natural England has previously commented on this proposal and made comments to the authority in our letter dated 18 October 2016 (Our Ref: 198111).</p> <p>The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.</p>	
<b>London Fire Brigade</b>	<p>The Brigade is not satisfied with the proposal for fire fighting as compliance with Part B% of the Building Regulations is not shown.</p>	<p>The applicant has supplied revised plans demonstrating compliance with Building Regulations.</p>
<b>Greater London Archaeological Advisory Service</b>	<p>Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.</p> <p>No further assessment or conditions are therefore necessary.</p>	<p>Noted.</p>
<b>TfL</b>	<p>Having reviewed the submitted documents, TfL have the following comments:</p> <ul style="list-style-type: none"> <li>- TfL understands that the development proposes: <ul style="list-style-type: none"> <li>- 126 residential units,</li> <li>- 63 car parking spaces</li> <li>- 159 cycle spaces.</li> <li>- Re-provision of a nursery and community centre.</li> </ul> </li> </ul>	<p>Conditions are recommended as requested.</p>

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- The site registers a Public Transport Accessibility Level (PTAL) of 2 on a scale of 1 to 6b which indicates a poor level of accessibility.</li>   <li>- The applicant proposes 44 car parking spaces for the residential element but this could increase to 54. This would give a ratio of 0.34 to 0.42 which is acceptable given the low PTAL of the site. TfL do note that parking for private accommodation would be 1:1 and TfL suggest that this is lowered to promote some use of sustainable transport. 7 parking spaces are proposed for the nursery element which TfL have no objection to. TfL request a car parking management plan, secured by condition to regulate car parking activity on site.</li>   <li>- The applicant proposes 9 Blue badge spaces which complies with London Plan standards and welcomed by TfL. In addition 20% of spaces should be fitted with Active electric Vehicle Charging Points (ECVPS) with a further 20% passive provision. Full details of car parking should be secured by condition.</li>   <li>- 159 long stay cycle spaces are proposed for the residential element which complies with London Plan standards. 4 spaces are proposed for the nursery/community uses which TfL have no objection to.</li>   <li>- In addition to assessing the suitability of cycle parking, TfL assess the design of cycle parking in line with London Cycling design Standards (LCDS). Cycle parking will be located in several stores around the site which TfL support. The applicant should clarify the security of cycle</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>parking. Furthermore the applicant should ensure 5% of cycle spaces can accommodate larger cycles. Full details of cycle parking should be secured by condition in consultation with TfL.</p> <p>- The applicant has provided a multi modal trip generation, forecasting 25 two way bus trips and 38 two way underground trips in the AM peak. TfL is content that this will have no material impact on the transport network.</p> <p>- Servicing will take place on site, which TfL have no objection to. The applicant has provided swept path, but TfL request the applicant clarify how the vehicles can manoeuvre in and out of the site in forward gear as it is unclear from the swept path. The applicant should also ensure that servicing and refuse does not occur wherever possible, during nursery drop off and pick up.</p> <p>- TfL is also concerned with potential impact on the TLRN during construction. The London Plan sets out policies regarding the management of freight movements. TfL therefore requires a Construction Logistics Plan for the whole development, be secured by condition to manage freight impact.</p> <p>Based on the above request being met, TfL have no further comments.</p> <p><i>Further comments:</i> Based on the revised plans, TfL welcome the changes made to the provision of Blue Badge parking and details</p>	



Stakeholder	Question/Comment	Response
	regarding the security of cycle parking.	
<b>GLA</b>	<p><b><i>Strategic issues summary:</i></b>  Land use: Redevelopment for residential-led development and community centre is supported; development would not have further impact on openness of Metropolitan Open Land. (paras. 13-15).</p> <p>Housing and affordable housing: 126 units proposed. 67% affordable by habitable room (78% by unit), intermediate Pocket Living homes proposed, which is strongly supported. Some variances from residential standards are accepted in light of the high affordable housing offer and overall high design quality (paras. 16-27).</p> <p>Design: Design is high quality and proposals are supported. (paras. 28-31).</p> <p>Inclusive design: Proposals do not currently provide 10% M4(3) units and the number should be increased accordingly. (paras. 32-33)</p> <p>Climate change: Carbon reduction target met and proposals comply with London Plan climate change policy; however further information is required to verify carbon savings. (paras. 34-35)</p> <p>Transport: Proposals broadly acceptable, applicant should reduce parking provision where possible, further information on cycling, servicing and construction should be submitted. (paras. 36-40).</p>	The applicant's response to the issues raised are contained within the Officer's assessment above.

Stakeholder	Question/Comment	Response
	<p><b>Recommendation</b>  That Haringey Council be advised that whilst the principle of the development is strongly supported, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 45 of this report. Possible remedies are set out in that paragraph to ensure full compliance with the London Plan.</p> <p><b>(The full Stage 1 Report is included at Appendix 5)</b></p>	
<p><b>London Parks and Gardens Trust</b></p>	<p>We write as Co-Chairs of the Planning &amp; Conservation Working Group of the London Parks &amp; Gardens Trust (LPGT). The LPGT is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest. Inclusion of a site in the HE Register is a material consideration in determining a planning application. The LPGT is the gardens trust for Greater London and makes observations on behalf of TGT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LPGT's Inventory of Historic Green Spaces (see <a href="http://www.londongardensonline.org.uk">www.londongardensonline.org.uk</a>) and/or when included in the Greater London Historic Environment Register (GLHER).</p> <p>Downhills Park (OS Grid ref TQ324896) is an early 20th</p>	<p>The impact of the application on Downhills Park is assessed in the report above.</p>

Stakeholder	Question/Comment	Response
	<p>century public park laid out on the former 18th and 19th century landscaped grounds of Downhills House by Tottenham Urban District Council in 1902-03 retaining earlier 19th century features and planting; it opened to the public on 6 August 1903. Downhills Park is included in the LPGT Inventory, which is in the process of being added to the GLHER maintained by Historic England. It is also included in Haringey's register of Public Parks, Gardens, Squares, Cemeteries and Churchyards of Local Historic Interest compiled by the LPGT in 1996. The Park should therefore be considered a non-designated historic asset and should be protected accordingly as required by the provisions of the National Planning Policy Framework.</p> <p>We acknowledge the well-presented and comprehensive landscape design proposals that would appear to provide high-quality public realm and a 'parkland' setting for the proposed development; however, the LPGT has the following observations:</p> <p><i>Alterations to boundaries and Metropolitan Open Land:</i> The proposed development includes a widened access off of Keston Road that encroaches into Downhills Park, altering an historic boundary that has existed since at least 1902-03 when the park was originally laid out (illustrated in the 1913-1914 OS Map) and may in fact be considerably older. Moreover, this encroachment will result in the loss of 15sqm of public park which is also designated as Metropolitan Open Land. In exchange, 65sqm of land within the south west corner of the applicant's demise will be given over to Downhills Park.</p>	

Stakeholder	Question/Comment	Response
	<p>While this increases the overall size of Downhills Park, it would appear to be in contradiction to Policy 7.17 of the London Plan, which states in paragraph 7.56 that <i>“Development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate”</i>.</p> <p><i>Building Heights and affects on character and setting:</i> The proposed 5-storey blocks of flatted accommodation in the west of the proposed development are out of keeping with the scale of existing surrounding development, which is characterised by mostly 2-3 storey residential housing. While the proposed boundary comprising a native hedge within 2m high vertical bar railings fronting Downhills Park will be an improvement to the existing boundary treatment, there are likely to be glimpsed views above the proposed hedge and between the existing mature trees towards the proposed 5-storey blocks, which will introduce taller built forms just beyond the eastern boundary of Downhills Park, affecting views, character and setting. Indeed, HTA’s Design and Access Statement mentions views of the park from upper levels of the proposed development, meaning users and visitors of the park are likely to be able to see the upper levels of the 5-storey blocks. This is in contradiction to Local Haringey’s Local Plan and February 2015 Urban Character Study (Seven Sisters area, p124), which set out guidance to limit building heights of 1-3 storeys for the area immediately to the east of Downhills Park.</p> <p><i>Proposed access – new entrances:</i> The two new entrances from the proposed development directly into</p>	

Stakeholder	Question/Comment	Response
	<p>Downhills Park will provide safe and efficient routes for the new residents and for those visiting the re-housed Nursery and Community Centre; however, these new entrances do not appear to offer any more direct or convenient access to the Park for the wider community than that already provided by the existing park entrance on Keston Road. These new (private) entrances may place additional burdens on local authority and police resources, and we note and agree with the comments made by the Designing Out Crime Officer in his consultation response.</p> <p>For these reasons, the LPGT objects to this application, on the basis that the harm to Downhills Park (a heritage asset) outweighs the public benefit from the proposed development. We would suggest that more be done to upgrade the Park for the benefit of all the surrounding residents to outweigh the harm caused by the proposed development, in accordance with NPPF.</p>	
<b>NEIGHBOURING PROPERTIES</b>	<i>244 letters of objection; 1 petition in objection; 18 letters of support</i>	
<b>Objections</b>		
<i>Keston Action Group</i>	<p><b><i>The Keston Action Group has submitted a full objection report on the application which is available at Appendix 6. The summary and conclusion is below:</i></b></p> <p>1. To summarise, the Applicant (Pocket Living) propose to redevelop an emerging Allocated Site (SA60) at Keston Road in Tottenham. The proposed scheme is for residential and community uses, but at a quantum of units and associated height, bulk and massing that far exceeds the relevant Local Plan guidance.</p>	

Stakeholder	Question/Comment	Response
	<p>2. These representations have been prepared on behalf of KAG who are strongly opposed to the scheme on the grounds that it is contrary to a whole range of national; strategic and local planning policies as identified within this report.</p> <p>3. In particular, serious harm will flow from the proposals in respect of their damaging impact upon:-</p> <ul style="list-style-type: none"> <li>- MOL and Downhills Park;</li> <li>- residential amenities;</li> <li>- highways and car parking;</li> <li>- the local character and townscape of the area; and</li> <li>- a flawed approach to meeting local housing needs.</li> </ul> <p>In respect of the latter, approval of the proposals would signal a significant departure from key affordable housing policies which would seriously undermine the Council's housing strategy and inhibit the future delivery of genuine affordable accommodation that is desperately needed in the Borough and throughout London.</p> <p>4. For all of these reasons, it is considered that the application proposals fail the Section 38 test of the Act and that the Council should therefore refuse planning permission accordingly.</p>	
<i>Friends of Downhills Park</i>		<p>I write on behalf of the Friends of Downhills Park, who have just been shown the Keston Action Group's formal objection to Planning Application HGY/ 2016/3309. We have not had time to hold a meeting to discuss their text, but following discussion of the building scheme in earlier meetings, I can state that the Friends fully support what is said in their objection about the damage that the proposal will do to the park, which is designated Metropolitan Open Land, by reason of the proposed detrimental and irregular land swap on the northern boundary of the site , and to the visually intrusive development on its western boundary, which would permanently and detrimentally change the character of the Park.</p> <p>I should add that 146 people objected to the proposed disposal of land forming part of the park by Haringey Borough Council in August 2016.</p>
<i>Neighbours:</i>		We would like to object to the proposed development on the following grounds:

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- The blocks of flats are not in keeping with the local area, neither in style or the number of storeys.</li> <li>- The loss of privacy to local residents, particularly those on Keston Road.</li> <li>- The added burden that will be placed on local parking facilities, due to the limited number of spaces provided by the development versus the number of new residents in the area. The on-street parking is already at the maximum capacity, especially in evenings and at weekends. This will be accentuated by additional visitors.</li> </ul>	
	<p>I am writing to object this proposal as it stands. I do so for three reasons: the proposed land swap; the provision of car parking spaces; and the design of the terrace housing on the east of the site.</p> <p>1. The Design and Access Statement indicates that the existing boundary with Downhills Park along the northwest edge of the site is to be removed, and the boundary resited to the west to allow for a wider entrance to the site and the construction of a five-storey block at the northern end. Nowhere in the Statement (that I could find) was there any clear indication of the extent of the land to be appropriated for this purpose, although the developer does say that the southern part of the site is to be opened to the west so that the land in effect becomes part of the public park. However, the London Plan expressly rules against land swaps of this nature, and although this guidance does not have legal force there would have to be very strong grounds indeed for ignoring it. None are provided, other than the developer's desire for a wider entrance and a five-storey block at the northern end. Even were this not the case, the opening of the southern part of the site to the west to allow public access raises immediate security considerations in respect of the school to the south of the site and indeed of the occupants of the terrace housing along the eastern edge of the site. This is another reason for rejecting the proposed land swap.</p> <p>It should also be noted that the part of the boundary which the developer wishes to remove seems to pre-date the establishment of Downhills Park as a park, and was in place when the grounds were still part of the now demolished Downhills House. Removal of this boundary would therefore amount to destruction of part of the Park's history.</p> <p>2. The Development and Access Statement notes that the site is conveniently located for two underground stations and several bus routes. That being so, it is quite unnecessary for the developer to wish to provide so many car parking spaces, particularly in view of the rather cramped nature of the</p>	

Stakeholder	Question/Comment	Response
	<p>site. Additionally, the provision of car parking spaces would appear to conflict with the income demographic at which this development is aimed; it would ordinarily be thought that occupants on a low income who would otherwise be struggling to afford a home of their own would have difficulty acquiring and maintaining a private vehicle as well. That being so, it would be appropriate to eliminate all but a few car parking spaces, and reserve those which remain only for delivery vans and emergency vehicles. This would in turn would allow more space for the blocks along the western edge of the site, allowing them to be either moved back from the boundary with the park or for their footprint to be increased, the latter of which would allow either for an increase in the number of flats or (preferably) a reduction in height by at least one storey because of the number of additional flats per floor which would result.</p> <p>3. Although the terrace housing on the eastern side of the site is claimed as complementary to the houses on Keston Road, these dwellings would in fact be taller because of the need to allow space for a bedroom in what would otherwise be the attic – a tallness which is accentuated rather than masked by the steep slope of the roofs on the side backing onto the houses on the western side of Keston Road, simply because the slope (down to the ceiling level of the ground floor) is so out of keeping with the roofs on Keston Road. Additionally, there is no explanation why the northern end of the terraces of houses on the eastern side of the site should be given over to a three-storey block of a similar design to the blocks on the western side - if the aim is to provide terrace housing complementary to that on Keston Road, then it follows that the whole of the eastern side of the site should be lined with terrace housing, not suddenly and incongruously break into a slab-like block (or, if entering the site from the north suddenly and incongruously break from a slab-like block into terrace housing).</p> <p>I therefore request that - despite the work the developer has done to consult with local residents and revise the proposal in the lights of comments already made - this proposal be rejected as it stands, and the developer asked to return with a proposal which, firstly, retains the existing boundaries with Downhills Park; secondly, removes most of the car parking spaces and moves the blocks on the western side of the site further from the boundary with the Park; and thirdly, redesigns the housing on the eastern side of the site to ensure that the roofs are more in keeping with the those of the houses on Keston Road and replaces the block on the northern end of this terrace with similar dwellings.</p>	
	I am a member of the Friends of Downhills Park. These are my objections to the development of	



Stakeholder	Question/Comment	Response
	<p>Keston Centre by Pocket Living: <input type="checkbox"/></p> <p><input type="checkbox"/></p> <ul style="list-style-type: none"> <li>- Development not in keeping with the surrounding 2/3 storey Victorian housing</li> <li>- Development poses a detrimental impact on local residents and family lives, local services, parking, with increased traffic and noise</li> <li>- Encroaches on the protected 100 year old Downhills Park and its historic boundary - in order to “improve access” – against Metropolitan Open Land regulations;</li> <li>- Development inappropriate to Haringey’s needs – housing needed for families not single middle earners; and includes numerous substandard “tiny” Pocket flats – only 38 Sq Metres</li> </ul>	
	<p>In my view the proposed development does not address the housing needs in the area, it does not really provide affordable housing for local families and does not address the housing crisis locally or improve housing stock for those who need it the most.</p>	
	<p>I have four further concerns regarding the proposed development at Keston Road:</p> <p>The proposed development because of its scale and position would result in an unacceptable loss of privacy, adversely affecting the amenities enjoyed by the residents on Keston Road. The mass, bulk and proximity would also present an overbearing and intrusive element to other neighbours at the rear of the development on Kirkstall Avenue and Ripon Road.</p> <p>The scale and siting, both in itself and relation to adjoining buildings, spaces and views, is inappropriate and unsympathetic to the appearance and character of the local environment.</p> <p>The proposed development would be out of keeping with the design and character of the surrounding housing and would have an over bearing and adverse effect on the visual amenity of the area as a whole.</p> <p>The housing around Keston Road is something Haringey can be proud of - period, beautiful, low rise, aesthetically consistent. A large scale multi storey building interrupting this would damage this asset, whereas a building that is 2 storeys would not have this negative impact</p>	

Stakeholder	Question/Comment	Response
	<p>The site is located in a predominantly residential area with quiet roads next to a park. This setting has attracted existing residents, and they can reasonably expect the area to retain this character. This development will multiply the number of residents in this area many times over which will likely result in noise, disturbance, litter and nuisance to the detriment of residents.</p> <p>To mitigate some of the negative impact to the existing community a significantly reduced number of units should be considered. In addition can the council propose dedicating some of the profits from any development to improving the poor paving, road surface and planting on Kirkstall Avenue, Keston road and Ripon Road? They are currently uneven and ugly, a constant trip hazard (especially for my small kids) and don't encourage the public to treat this area with care and avoid littering.</p> <p>The proposal reduces the amount of legitimate car parking on the site and in the area to an unacceptable level. Insufficient parking space will adversely affect the amenity of surrounding properties through roadside parking. The large increase in population will likely create conflicts between pedestrians, cyclists and vehicular movements in the area thereby creating a safety hazard.</p> <p>As well as a reduced number of units and the introduction of parking permits are there any other steps that can be proposed to mitigate against the impact of the vastly increased traffic? Can we be reassured that the road-block between Keston road and Phillip lane will be maintained as part of the planning consent?</p> <p>If the development goes ahead there will be years of disruption to this community. If the consultation is genuine and the council and Pocket actively and publicly considers ways of addressing concerns and develops alternatives, it will gain good will that will be valuable as the development continues.</p>	
	<p>I believe that the development will have adverse effect on the residential amenity of neighbours and park users by reason of overlooking, loss of privacy and overshadowing. I am particularly concerned that this will have impact on families and children in Downhills Park.</p> <p>I also believe that the development is at an unacceptably high density for the site given that it intends to add the same number of houses/flats as Keston and Kirkham Rds combined. The Visual impact of the development will have a negative effect on the character of the neighbourhood as it is over-bearing,</p>	

Stakeholder	Question/Comment	Response
	<p>out-of-scale and out of character in terms of its appearance compared with the period properties in the area, and drastically alters the look and feel of Downhills Park.</p> <p>The proposed development also encroaches on the protected 100 year old Downhills Park and its historic boundary - in order to improve access. This goes against Metropolitan Open Land regulations and will have damaging impact on the local community.</p> <p>Finally it is clear that the development is wholly inappropriate to Haringey's housing needs, prioritising single middle earners rather than young families. The proposed development also prioritises quantity over quality of living units, with numerous substandard tiny 'pocket' flats.</p>	
	<p>My concerns are:</p> <ol style="list-style-type: none"> <li>1) strategic issues around travel infrastructure - that we will see over 100 young professionals placing extra burden on the 41 bus route at rush hour between Turnpike Lane and Seven Sisters,</li> <li>2) strategic issues in that it is potentially creating slum dwellings. Pocket Living are confident that the young professionals who they anticipate buying these one-bed flats will "move out of London in 5 years or so", but if they cannot afford to move out (and in my view are unlikely to as the jobs are in London), the scheme will become hugely overcrowded with very cramped living conditions for families.</li> <li>3) Loss of light for Keston Road neighbours - although this does not affect me directly.</li> <li>4) This development will significantly damage the character of the area, with 5 storeys (at consultation they said they had reduced it to 4!) overshadowing the park with at least one floor above the tree line, and also that it is significantly towering over the existing Keston Road properties which are only 2 storeys.</li> <li>5) I do not understand why Haringey Council is giving park land to car parking. This is hugely anachronistic, in an era when most if not all your young professionals are cyclists, not car owners, it is simply not necessary to provide car parking space. It is particularly wrong to give green space over to car parking space. I was told it was due to some quirk of not having a CPZ in the area that meant the council was 'obliged' to provide parking space. This is simply ethically wrong (regardless of whether it's technically or legally correct), and I am struggling to explain to my children why Haringey Council would tarmac green space for the provision of cars!</li> </ol>	
	I object to the planning application on the grounds of;	negative effect on local amenities, including

Stakeholder	Question/Comment	Response
	traffic, parking and road safety. Loss of light and privacy of neighbours. Noise and disturbance resulting from new uses. Effect of the proposal on the character and appearance of an area.	
	I object to this planning application for many reasons. The development is not in line with the surrounding area, with my main concern being its encroachment on Downhills Park. Downhills Park is such a valuable asset to our local community and I believe that this application contravenes the Metropolitan Open Land regulation. This housing development as the planning stands, would take away some of the park land, and also overlook the park and our children playing. Further, the proposed height of the development is not in line with existing houses. I believe that this development is totally inappropriate for the area.	
	This should be refused due to the height not being in line with nearby 2 storey housing also it would be detrimental to the enjoyment of the park and too imposing on local residents also it encroaches on the protected 100 year old Downhills Park and it's boundary and it is inappropriate for Haringey's housing needs for families.	
	<p>I am horrified at the plans to allow Pocket Living to build flats alongside Downhills Park. Not only are the proposed flats completely out of character with the houses in the area, they would be vastly taller, blocking out much-needed light to neighbours and those in the park, a giant eyesore looming over a beautiful section of the park where children play and should be able to enjoy the sunshine. The problems it would cause with the influx of traffic and cars is awful to think about. The air quality along West Green Road has already been recorded at dangerous levels - do you really think it is responsible to increase this?</p> <p>The noise and the over-population it would bring to this area would ruin what is a very special corner of Haringey. I am hugely upset thinking about it. I moved here to be near the park, to be near open space and feel like I had room to breathe. You are taking that away from me and countless other residents. Children in London already see such little open green space and breathe in such dirty air - you will be compounding this problem. These plans are highly irresponsible and I will join other residents in fighting them, all the way to court if needs be.</p>	
	I do not consider 5th floor (maybe even 4th floor) self contained property(s) should be built with only	

Stakeholder	Question/Comment	Response
	<p>stairwell access and no lifts. The cost of maintaining lifts would presumably fall on those living in the blocks this is presumably why lifts are not proposed. I consider the play group nursery roof/extensions exhibited at the public consultation unsuitable in an area with many trees - moss/leaf debris will be caught in their rounded shape and the council will have to pay for regular cleaning of the plastic/Perspex proposed roofs. I think there is inadequate provision for parents waiting /collecting children at the play group finishing time by car. I think if the scheme goes ahead there is a need for quite a large residential parking permit scheme in surrounding roads due to displacement of parked vehicles in the surrounding area (which can struggle with parking at the present time.)</p> <p>If the Harris Academy school is saying there has to be an adequate turning circle in the Keston road site for the fire brigade/emergency long laddered vehicles to evacuate from the higher levels of the school and higher levels of the proposed buildings on the Keston site this is essential the vehicles should not be expected to go backwards in smoke/emergencies</p> <p>The strong (mainly metal) existing Downhills Park Fence must be stipulated to be retained so that it is for Downhills Park to decide on plants and trees within the park and the screening of the park for privacy. The additional portion of ground seeded to the park from the Keston road site should be marked by boundary nodes at ground level only- the park fence should be retained there. Vehicular access needs to be made difficult for all but emergency and park vehicles - in past years there has been unauthorised traveller caravans and dumping in the park this needs to be prevented and all access points between the park and the Keston road site enabled to be strictly controlled for vehicles and the fence only removed at any new access paths into the park only. I do not favour soft park boundaries there needs to be clear boundaries so that the park may plant to enable privacy - the existing metal fence is very strong and must have cost the council a lot to put there- it should be maintained to aid privacy and prevent encroachment of either site.</p> <p>The London fire and emergency planning authority needs to be shown compliance with part B5 of the building regulations for fire fighting including an adequate turning circle given the need to access the higher levels of buildings in the Harris Academy occupied by children under 11 years of age.</p> <p>I object as the proposal is OVERLOOKING excessively a quiet walkway and part of the park. If townhouses were built with very narrow back windows/vents at ground floor this could accommodate a</p>	

Stakeholder	Question/Comment	Response
	<p>shower toilet and washing machine area and car parking space and stairwell to the upper floors. This would enable the strong park metal fence to continue with shrubbery in front. Smaller windows consistent with the townhouses like those in Wilmot road/Hastings road town houses would enable a view of the park without feeling overlooked by large windows and balconies- burglary from the park would be minimised by retaining the fence and shrubbery and back ground floor walls. Smaller Windows on upper floors would still enable crime in the park to be potentially observed without destroying privacy in this part of the park Townhouses throughout at the original 70 Odd people proposed for this site in the original plans for this area would not be OVERBEARING nor increase DISTURBANCE nor be OUT OF CHARACTER with the surrounding area nor have the OPPRESSIVE IMPACT all of which are found in the current scheme. It would lessen the OVERSHADOWING this lovely part of the Park.</p> <p>There may be a place for pocket living type flats elsewhere in the borough (which I am told need to be high inside to create the illusion of space inside. This very height is a problem in this location.) Surely family accommodation such as townhouses is best near a park and schools. Small pocket homes for key workers without families are better suited to more built up areas. There has been strong attendance at meetings to discuss these plans and even those not attending who I have spoken too have indicated opposition there is too much wrong with this.</p>	
	<p>The new blocks range from 3-5 storeys, which is totally out of keeping with the scale of houses in the vicinity; KR residence living on the west side of KR will be overlooked and lose privacy; this may also negatively effect house price values; the park will overlooked and the view from the park will be negatively impacted; the style of the houses is not in keeping with the area; 126 units is much too high density; KR will become much busier - traffic, noise, etc.; the addition of new housing without adequate parking for all units will cause massive problems to the already congested parking in KR; the development goes against the MOL regulations and sets a negative precedent.</p> <p>The units are billed as affordable to local first time buyers however, having been spoken in person to Pocket Living who were verbally evasive about actual unit pricing I have no trust whatsoever that this will be the case. Also the units are tiny - this is purely to the advantage of PL to generate extra revenue through sales.</p>	

Stakeholder	Question/Comment	Response
	<p>I strongly object to the proposed development of the Keston Road/ Downhills Park site for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The proposed 4/5 storey flats will create a sense of enclosure on surrounding properties and park and cause a significant loss of visual amenity.</li> <li>2. The development would overlook both the park and houses, adversely affecting public green space and ruining views.</li> <li>3. The massing is disproportionate to the surroundings - the buildings proposed are too high and should be limited to 2 storeys to avoid such negative impact.</li> <li>4. The development blocks sunlight and restricts views.</li> <li>5. Car parking spaces should be replaced with cycle stores only, in keeping with sustainable values and insuring that there is no increase in vehicular traffic, as this would cause unacceptable levels of pollution (levels on West Green Road are already high) and noise in a green, quiet family area. In spite of the objections, I understand that some development could still happen on the site, albeit significantly reduced in size. In the event of any development, I feel that more should be done to improve the surrounding streets including:</li> <li>6. Significant improvement of park - particularly playground facilities (much larger, high spec playground on par with facilities at Clissold Park/Finsbury Park, to provide for increased usage)</li> <li>7. Repaving of surrounding pavements as an extension to and matching the hardscaping at the recent West Green refurbishment, including pavements all round the park and adjacent streets, and providing new trees planted along streets.</li> <li>8. New mature trees planted to reinforce screen in the park along the development, so as to block views of the new reduced scheme.</li> <li>9. Public cycle storage facilities for local residents around the development.</li> </ol>	
	<p>I have lived at the same address for 40 years and value our open park spaces and think the development poses a detrimental impact on local residents and families who live here and our local services. I also do not think the housing needs will be met as designed to suit single middle earners rather than families.</p>	
	<p>Downhills Park is an important green space for a large number of people - not only families with children - who live in the surrounding area. It would be wrong to remove green space from the park to make way for an unsightly development, especially one with housing units more suited to single</p>	

Stakeholder	Question/Comment	Response
	occupants and not families, which the borough desperately needs. I am not against development per se but the current proposal is the wrong one for the area and I, my wife and many other residents are strongly opposed to it.	
	A 4- or 5-story building project, overlooking both houses and Downhills Park, and appropriating part of the park, is totally unacceptable for the area. Not providing sufficient parking is also extremely short-sighted and will have a knock-on effect on the already crowded neighbourhood. The developers need to go back to the drawing board.	
	<p>I object your plans for Keston Centre. Not only is the proposed plan visually extremely unpleasing, but also its impact on the neighbourhood due to disturbance and increasing traffic and noise is concerning. Downhills Park is an extremely valuable resource for Haringey that brings an immense amount of joy to the local families and the current plan undermines that.</p> <p>I do agree that more housing is urgently needed for lower income families. However, this development is not sufficient. The flats are tiny and there have been no guarantees that they would be affordable, not only in name but also in actual price. Haringey needs to find a way to ensure the living standards of the local residents and this plan unfortunately does not do that.</p>	
	<p>I feel there will be an adverse effect on the residential amenity of neighbours, by noise and overshadowing of the park. The development has Unacceptably high density and overdevelopment of the site-this seems relevant as it's the same number of houses/flats as Keston and Kirkham Rd.</p> <p>There will also be a visual impact of the development. There will be a negative Effect of the character of the neighbourhood. The Design is modern and dose not fit in with the area Overall the proposed development is over-bearing and out of character in terms of its appearance compared with existing development in the vicinity.</p>	
	<p>I do not like this development for a number of reasons including:  Development not in keeping with the surrounding 2/3 storey Victorian housing; Development poses a detrimental impact on local residents and family lives, local services, parking, with increased traffic and noise; Encroaches on the protected 100 year old Downhills Park and its historic boundary - in order to</p>	



Stakeholder	Question/Comment	Response
	improve access - against Metropolitan Open Land regulations; Development Inappropriate to Haringey's needs - housing needed for families not single middle earners; and Includes numerous substandard tiny Pocket flats - only 38 Sq Metres.	
	<p>As a regular park user and resident of the Downhills Park area I strongly oppose the current proposals for the Keston Centre as set out in the above planning application. My reasons are listed below:</p> <p>I believe that the development runs counter to Local and London Planning policy in numerous areas and on that basis I urge the Planning Sub Committee to refuse permission for this application.</p> <p>1. The proposed development is inappropriate and a threat to the open nature of Downhills Park. The visual impact of the development will have a negative effect on the character of the neighbourhood as it is overbearing and out of scale. It drastically alters the look and feel of Downhills Park. Views from the Metropolitan Park Land (MOL) will be drastically and adversely affected causing serious harm to this strategic designation. It is against the Saved Unitary Development Plan 2013 section OS 5 which states development is allowed if it protects and enhances the value and visual character of open land. The density and 5 Storey blocks dominating the Park will not do this. (Reference: Pocket Planning Document Sec 5.4.3).</p> <p>The Developers have stated that the blocks will be screened by the trees. Even if this were true when the trees are in full leaf, it is not the case when the deciduous trees are bare or in bud, i.e. for the majority of the year. At their consultation the developers also said that they want to bring the park right into the development which I take to mean that they will get rid of as much screening vegetation as necessary to open up the boundary between park and development.</p> <p>2. The development height of 5-storey blocks is out of character in terms of its appearance compared with the period properties in the area - the vast majority of the residential housing comprising 2-storey, mainly Victorian terraces.</p> <p>It is not compliant with the guideline height for developments outlined in the Haringey Local Plan (the Urban Character Study, Seven Sisters area, p124). This recommends the building heights for the area do not exceed 1-3 storeys and states that development should respect and reinforce the predominate</p>	

Stakeholder	Question/Comment	Response
	<p>2-3 storey townscape.</p> <p>3. The density of the development is too high for the site given that it intends to add the same number of houses and flats as Keston Road and Kirkham Avenue combined but in a smaller area.</p> <p>Again this is not compliant with the Local Plan. The 126 homes proposed far exceed the 70 residential units as stated in Haringey's Site Allocations DPD, Jan 2016 Site ref. SA60.</p> <p>4. It encroaches on Downhills Park counter to MOL Regulations. The development proposes swapping part of the protected 100-year old Downhills Park and its historic boundary in order to improve access. This is counter to Metropolitan Open Land regulations in that, firstly there has been no consultation with neighbouring local authorities and secondly that land swap is not equivalent or appropriate. The bit of land Pocket Living propose to give back to the park is a strip of tarmac behind the current park boundary. To integrate this strip of land into the park would mean taking down more vegetation and exposing the development behind.</p> <p>This development runs counter to London Plan Policy 7.17 and Site Allocation SA60 (above) as it has a detrimental effect on and does not respect the Park Please note that 146 people have already objected to this in August 2016 when a Disposal of Land Notice was issued.</p> <p>5. Conservation Objection: The applicant has not explored the potential to convert the former school building, which has value as a heritage asset, as required by the Council's relevant criteria associated with the Council's emerging site allocation in the Local Plan (SA60) that retention could be considered in Development Guidelines . This was further reinforced at the Planning Inspectors EIP on 31/8/16 when educational or community usage was agreed by LB Haringey to be considered.</p> <p>6. Adverse Effect on Amenity. This development will have an adverse effect on the residential amenity of neighbours and park users by reason of overlooking, loss of privacy, overshadowing and an unacceptable sense of enclosure. I am particularly concerned that this will have a negative impact on families and children using Downhills Park.</p> <p>7. The development is wholly inappropriate to Haringey's housing needs, prioritising single middle-</p>	

Stakeholder	Question/Comment	Response
	<p>earners rather than young families. The proposed development also prioritises quantity over quality of living units, with numerous substandard single person flats that are no more than bedsits. Pocket Living say 78 % of the Keston site housing will be affordable. At their consultation they also said that a prospective owner of one of their studio flats would have to be earning at least £40000 per year to be able to afford their mortgage. In their promotional material, Pocket Living have called their target buyers city makers. It remains to be seen how many of these would be local residents.</p> <p>In light of the numerous planning objections outlined above and the detrimental impact on the neighbourhood and Downhills Park, I urge that this planning application be refused.</p>	
<p><i>(159 objections with same/similar content)</i></p>	<p>I am writing to state my strong opposition to the current proposals for the Keston Centre in the above planning application. I understand that the development runs counter to Local and London Planning policy in numerous areas and on that basis I urge the Planning Sub Committee to refuse permission for this application. It would impact negatively on the local area in ways I have stated below:</p> <ol style="list-style-type: none"> <li>1. Five storey blocks. These are not in keeping with the period properties in the area, the vast majority of the residential housing comprising two floor Victorian and Edwardian terraces. The proposed development is not compliant with the guideline height for developments outlined in the Haringey Local Plan (the Urban Character Study, Seven Sisters area, p124). This recommends the building heights for the area do not exceed one to three storeys and states that ‘development should respect and reinforce the predominant two to three storey townscape’. It also contradicts the London Plan Policy 7.4 on Local Character.</li> <li>2. Density. This is too high for the site given that it intends to add the same number of houses / flats as Keston Road and Kirkham Avenue combined but in a much smaller area. Again this is not compliant to the Local Plan. The 126 homes proposed far exceed the 70 residential units as stated in Haringey’s Site Allocations DPD, Jan 2016 Site ref. SA60.</li> <li>3. Visual impact. This will have a negative effect on the character of the neighbourhood as it is overbearing and out of scale. It drastically alters the look and feel of Downhills Park. Views from the Metropolitan Open Land (MOL) will be drastically and adversely affected causing serious harm to this strategic designation. It is against the Saved Unitary Development Plan 2013 section OS 5 which states</li> </ol>	

Stakeholder	Question/Comment	Response
	<p>development is allowed if it protects and enhances the value and visual character of open land. Then density and five storey blocks dominating the Park will not do this. (Reference Pocket Planning Document Sec 5.4.3). The Developers have stated that the blocks will be screened by the trees. Even if this were true when the trees are in full leaf, it is not the case when the deciduous trees are bare or in bud which is for the majority of the year.</p> <p>4. Counter to MOL Regulations. The impact on Downhills Park will be negative and is counter to MOL regulations. The development proposes swapping part of the protected 100-year old Downhills Park and its historic boundary in order to improve access. This is counter to Metropolitan Open Land regulations in that, firstly there has been no consultation with neighbouring local authorities and secondly that land swap is not equivalent or appropriate. This development runs counter to London Plan Policy 7.17 and Site Allocation SA60 (above) as it has a detrimental effect on and does not respect the Park.</p> <p>You will be aware that 146 people have already objected to this in August 2016 when a Disposal of Land Notice was issued.</p> <p>5. Conservation Objection. The applicant has not explored the potential to convert the former school building, which has value as a heritage asset, as required by the Council's relevant criteria associated with the Council's emerging site allocation in the Local Plan (SA60) that retention could be considered in Development Guidelines . This was further reinforced at the Planning Inspectors EIP on 31/8/16 when educational or community usage was agreed by LB Haringey to be considered.</p> <p>6. Adverse Effect on Amenity. This development will have an adverse effect on the residential amenity of neighbours and park users by reason of overlooking, loss of privacy, overshadowing and an unacceptable sense of enclosure. I am particularly concerned that this will have a negative impact on families and children using Downhills Park.</p> <p>7. Need for 65 Car Parking Spaces in Development. I do not agree with the proposed provision for car parking. This is based on poor transport accessibility as calculated in the PTAL test (score 2). This contradicts the Interim TPP's Transport Assessment attached to Pockets planning application HGY/2016/3309 which states on page 4 that in reality the site is located within a walking distance of</p>	

Stakeholder	Question/Comment	Response
	<p>five bus routes and 1.2km from Turnpike Lane Underground Station, 1.4km from Seven Sisters Underground Station and 1.5km from Seven Sisters National Rail Station.</p> <p>Additionally, page 115 of Haringey's Urban Character study, states that Seven Sisters benefits from good to excellent PTAL.</p> <p>8. Traffic and Parking Impact on Keston Road and surrounding roads. I am concerned about the huge transport impact from 126 dwellings and the traffic that will pass through the quiet residential streets. Traffic calming measures have already been introduced on Keston Road and Kirkstall Avenue due to the previous high volume of traffic. This development threatens to reverse this and will also have a negative impact on the already scarce parking in the area. The level of traffic generation and proposed car parking will have a serious adverse impact on highways safety and is not compatible with the capacity of the local highways network.</p> <p>9. The development is wholly inappropriate to Haringey's housing needs, prioritising single middle earners rather than young families. The proposed development also prioritises quantity over quality of living units, with numerous substandard single person flats that are no more than bedsits.</p> <p>I urge that this planning application be refused. There are so many planning objections and the subsequent detriment to the neighbourhood and Downhills Park would be considerable.</p>	
	<p>This will have a detrimental impact to the area. Why don't you think about building houses with gardens and introducing families back to the area. Not flats that will bring antisocial behaviour, and problems with parking.</p> <p>I have grown up on the streets around Keston Road and Downhills Park since 1977. I have seen the area change throughout the 35 plus years and people come and go, and recently the area has been improving. The area does need funding but this is the wrong sort of development given its size and it the in the wrong place. Parking is a problem currently, and you should not be aiming to change usage of parts of the park. By building these flats you will be doing what you do in other parts of Haringey and ruining Downhills. I just have to look at parts of Tottenham and wood green to see the recent developments - flats do not bring a neighbourly spirit, cramp people into areas, and you are looking at</p>	

Stakeholder	Question/Comment	Response
	introducing way too many flats here on what would be a prime location. I am also worried about the people that you will move into the area. Money should be invested in the local school and existing facilities. I feel this is the nicest part of Tottenham, and it doesn't need another estate to be built. Try fixing the estates we have like broadwater farm.	
	<p>I have been using Downhills Park for 33 years and I have lived in Tottenham for that time also. This is an entirely inappropriate plan and will ruin the park, which is for the public to enjoy and not for greedy property speculators to get rich and fat on. It is obscene that our public parks are being raped by these anti-social thugs and the council is allowing these planning applications to be even considered.</p> <p>This sort of obscene behaviour by these fat bloated property developers is a sad reflection on our politicians and the time we live in, where money and greed is considered more important than the well being of children and adults who desperately need the parks, the clean air they provide, and the haven they offer from the grim streets of Haringey and greater London, and the diesel fumed polluted air that the corrupt politicians have given us.</p>	
	<p>As a resident and a Park user I strongly oppose current proposals for the Keston Centre. The development is in breach of the Local Plan and of London Planning policy. Permission for Pocket Living's aggressive development should be refused because:</p> <ul style="list-style-type: none"> <li>- 5 storey buildings will overshadow and overlook the Park and will be overbearing. This will destroy the tranquillity of the Park.</li> <li>- The proposed density of the development is far too high and runs counter to the Local Plan and will over burden local services.</li> <li>- The visual impact of the development will have a negative effect on the character of the neighbourhood.</li> <li>- The development is predicated on taking away Metropolitan Open Land. This will set an appalling precedent. All residents need Parks and MOL, we must defend all designated MOL from development.</li> <li>- My children all attended West Green Playgroup, they loved and benefitted greatly from the large grassy outdoor play space. Pocket's proposed playgroup new build has only a minuscule outdoor play space. Children need outdoor play, especially those who live in small flats/studios like those proposed in this development.</li> </ul>	

Stakeholder	Question/Comment	Response
		Please do not grant planning permission for this highly inappropriate development.
		I am objecting to this application because I think Downhills Park should not be developed on, not even in a small way. I think the buildings are too tall and not in keeping with the other Victorian housing in the area. I think the proposed development is ugly to look at and I do not like the idea of housing overlooking a children's playground in the park. Many people living in flats depend on the park, as a place to walk and sit and I think this proposal will spoil the park for local residents. We need more affordable family homes in Tottenham not pocket sized flats, that very few local people will be able to afford. I think if this proposal was about Alexandra Palace and a development being proposed on the edge of Alexandra Palace, Muswell Hill residents would be in uproar. Many Tottenham residents are opposed to this.
		<p>The plans bear no relation to the properties in the surrounding area ie two storey 3 bedroom houses but are mainly very small 1 bedroom flats on, we understand, 5 floors. Therefore they are out with planning regulations which state that the projected development should be in keeping with the surrounding area.</p> <p>The flats as shown in the plans will be unsightly as compared to the present aspect of the area. The flats at 5 storeys will be an eyesore from the park. From your website I can see that all the trees have been removed from the edge of the park, and once the site has been sold to Pocket I suspect there will be little control over what they are able to do on what will become their property.</p> <p>Chopping away part of the Park, to enable the pre-offsite built flats to be bought onto the site on the back of lorries, is also totally unacceptable.</p> <p>There is also social issue here. 110 one person flats with a tiny amount of space provided in each (38sq metres) will soon become unfit for purpose. The flats clearly aimed at single young people would soon become occupied by two people and then have children living in them in overcrowded conditions.</p> <p>The fact that no social or affordable housing is to be provided is yet another reason to oppose this development.</p>

Stakeholder	Question/Comment	Response
	<p>I live in Keston Road N17 6PJ and strongly object to the planning application for the Keston Centre. The proposed development is not appropriate to Haringey's housing needs in that it prioritises single high earners rather than young families on low incomes. Most of the flats are in reality bedsits. The proposal focuses on providing a large number of inadequate tiny flats rather than social housing for young families.</p> <p>The proposed 5-storey blocks are too high. They are not in keeping with the housing in the neighbourhood which is typically 2-storey terraced housing. The high blocks will have a detrimental effect on the existing housing on the western edge of Keston Road, overshadowing, blocking light and transforming the area. The high blocks will have a serious effect on Downhills Park as they will visually dominate the eastern edge of the park and overlook the children's playground.</p> <p>The proposed plans appear to remove the boundary fence between the development and Downhills Park. It is hard to believe that such a proposal will be granted permission as the ground floor flats will open straight onto the park including the playground. The removal of the fence will lead to the removal of any trees and bushes in time. Where will the park end and the property of the blocks begin?</p> <p>The density of the development is too high. I understand that the Haringey Local Plan envisaged the potential creation of 70 residential units. The proposed development has 126 units, most of them designed for single people. Unless the flats are sold to nuns and monks it is inevitable that the single people will acquire partners and children. The density of housing is far too large.</p> <p>The proposed terrace of town houses is better than the proposed blocks but why is the design not in keeping with the neighbourhood? From the diagrams I have seen the top storey of the houses appear to look like an imposing institution with the effect of a large wall facing the existing back gardens on Keston Road. This will have a severe detrimental effect on the existing properties.</p> <p>Downhills Park is one of the prettiest parks in Haringey. Proposed developments would dramatically alter the character of the park. Besides the proposed 5-storey blocks there is also the possibility of a large structure being built on the park to accommodate Crossrail 2. Downhills Park as we know it would be destroyed.</p>	



Stakeholder	Question/Comment	Response
	<p>I object to London's internal green belt or Metropolitan Open Land being encroached on in any way.</p> <p>I object to the proposal to remove the large willow tree inside the demise of the development. The Tree Report produced by the developers is self-serving. Most of the trees at the edges of the development are not due for removal but all the trees in the centre of the development, including the large willow, are due to be removed for various spurious reasons. In my opinion the willow has a high ecological and aesthetic value and should not be removed. Any future development should be able to accommodate the willow and, indeed, make it a wonderful feature.</p> <p>I do not understand why alternative uses for the Keston Centre have not been explored. It is right next to a gorgeous park and a wonderful building which could be refurbished and altered for socially useful projects such as social housing or sheltered housing for the elderly or disabled or a new school or other community amenity. The proposed development has all the hallmarks of putting private profit above the public good.</p> <p>I am in favour of a development that provides social and genuinely affordable housing, preferably council housing. The existing property could be amended to make an ideal home for the elderly or disabled.</p>	
	<p>I object against the proposed planning application for the following reasons:</p> <ul style="list-style-type: none"> <li>-the planned building is out of character for the area, particularly for housing around Downhills Park. We often use Downhills Park as a recreational area as it's situated directly next to our children's school. The proposed buildings would decrease the recreational value of the park, especially for children of the nearby school.</li> <li>-The planned building is not aiming on the primary housing needs of Haringey residents. More family friendly housing is required.</li> <li>-The impact on traffic of West Green Road and surrounding areas is already high – the proposed housing would increase the number of cars in the area and the impact on traffic and environment.</li> </ul>	
	<p>The scale of this development is out of character with the local area. There is no provision of improvements in infrastructure e.g. improved transport links, additional parking (it is already virtually</p>	

Stakeholder	Question/Comment	Response
	<p>impossible to park on the surrounding roads). It will cause additional strains on local school places and local childcare provision - which is already increasingly difficult to find.</p> <p>Whilst I do not object to some form of development on this site, the current proposal of 5 stories does not fit in with the local character and will cause maximum distress to local residents. A reduced number of stories would reduce the negative impact that this development will have on the local community both aesthetically but also during the piling methods that would be needed to support such a structure.</p> <p>I also have concerns over the environmental impact assessment that relates to this project. The impact on air quality and noise pollution during construction is going to be very negative for the local school children whose playground is within view of the proposed site. How does this combined with the negative impact on the park (which will reduce the number of users) contribute to any Haringey Health Agenda. It is presumed that children will have to remain indoors during key parts of the construction process.</p> <p>The building proposed for demolition is also a site of historic local interest and this type of building should surely be able to be retained in some form in a new development. It should not be development at all costs just to put up some blandly designed tower blocks.</p> <p>I also have concerns over pocket parks construction methods. Their chief executive at the Conservative Party Conference stated that they manage to carry out modular construction at their warehouse and they have little need for local support and construction work (how does this tie in with statements on local employment being provided during the construction phase?).</p>	
	<p>I have lived in Haringey for close on 35 years - initially on the Haringey ladder and for the past 29 years within a short walk of Downhills Park, and it was the proximity of the park and the pleasant views it afforded that persuaded me to move nearby. The advantages that proximity to the park offered - and fortunately at present still does offer - are in great danger of being severely compromised. As a resident who would be adversely affected should this proposed development proceed as planned, I strongly oppose the current proposals for the Keston Centre in the above planning application for the reasons set out below, and not only in its own terms, but also the precedent it sets for further encroachments on green spaces in the borough, whose social, cultural, invigorating and health-giving benefits far</p>	

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	<p>outweigh any imagined short-term financial benefits.</p> <p>Furthermore, it is surely an inescapable truth that such green havens, once infringed upon or taken away entirely, are most unlikely to be restored to the public that has been denuded of them.</p> <p>1. Need - If the proposal is intended to alleviate a housing shortage in Haringey, then a better plan would be to provide rented accommodation, especially for those with limited means rather than for people who can afford to purchase a new home. It should also make better provision for families rather than catering almost exclusively for single occupancy in what resembles nothing so much as a fairly shabby piece of Bedsitterland. It is also difficult to see why potential buyers, particularly of the studio flats, would choose to live in such a cramped space cheek by jowl with 100 plus other residents also effectively denied the freedom to swing the proverbial cat. As a plan to enhance the living conditions of prospective new residents or those already living in the area it more closely resembles a dog's dinner than a possible rescue plan for centrifugally disinclined cats.</p> <p>2. Deleterious impact on the local environment - The application proposes glooming the local environment by throwing up a nondescript lump of architecture that is both out of keeping with the height and reasonably elegant frontages of the terraced houses in the neighbouring streets and which exceeds by some distance the average density of the neighbouring dwellings. It is not even equivalent to squeezing a quart into a pint pot; what is proposed is tantamount to forcing a quart into a standard syringe and the consequences are likely to be every bit as messy.</p> <p>The terraced houses that adjoin Downhills Park are for the most part only two storeys and, consequently, do not obtrude above the height of the parkland trees, but the four/five storey buildings proposed will certainly overshadow many of the trees and would hardly represent an attractive blank canvas against which to view and enjoy that greenery.</p> <p>Downhills Park is a rare local haven of green quietude and its contours should be preserved as a key amenity not only for those who live nearby but also for visitors from other parts of the borough and beyond. Nor should the pleasant views of it from its perimeter and from within be compromised. Whatever else this development may offer, apart from easy profits for the developer, it will not be an enhancement of the park nor of the living conditions of those who currently live in the vicinity of park.</p>	

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	<p>3. Pollution - The air quality, which in London is already far from enviable, will be further diminished by the presence of all these new dwellings crammed into a small area - not only from waste gases from domestic appliances, but also (very probably more toxically) from vehicles belonging to those who will be housed in the new development.</p> <p>There is also the issue of domestic waste - currently, each household in the area is supplied with two large wheelie bins, so I am concerned about where 252 new bins will be accommodated in such a restricted area and the chaos likely to ensue when these are moved to and fro at refuse collection times. With non-recyclable waste only being collected fortnightly, many bins in the area are overflowing well before the next scheduled collection date, the result of which is a trail of uncollected detritus along the pavements after the bin lorry has passed. Consequently, I am less than sanguine about the implications of the waste-removal procedures of the development for the size of the rodent population in the area - not least given the probable paucity of neighbourhood cats (see point 1). Then there are the perennial problems associated with general littering of public spaces and more organised large-scale dumping and fly tipping, neither of which seems likely to be improved by a significant increase in the population adjoining the park and the provision of a new space open to the public at large, not all of whom can be guaranteed not to despoil rather than decorate the neighbourhood. These are aspects that not only carry the risk of lowering the morale of both existing and new residents but also the risk of hazarding health and safety.</p> <p>4. Traffic and parking - Aside from the pollution aspects of many more vehicles in a small area, there are likely to be issues, even unneighbourly conflicts, over parking, as well as problems with increased traffic flow in the streets closest to the development. Also, it is not only cars belonging to the new residents and bin lorries that will require access to the development, but also a range of delivery vehicles (especially given the increasing popularity of online ordering of food shopping) and emergency services vehicles. Pressure on available parking in such a confined area could also lead to parking in unauthorised areas, which could block access for emergency vehicles, a situation that could have dire consequences.</p> <p>This increased volume of traffic is likely not only to lead to greater congestion (with its attendant risks of increasing incidence of disputes between motorists) but also to damage the road infrastructure. It could also endanger the lives of pedestrians (particularly the elderly, the infirm and children) - for example,</p>	

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	<p>there is only one pedestrian crossing along the whole length of Downhills Park Road and not everyone is going to walk out of their way to reach that, particularly if they want to access the park through one of the other gates.</p> <p>5. Pressure on local resources - It would seem more than probable that the presence of so many additional residents would further stretch resources such as local GP surgeries.</p> <p>6. The social mix - It would seem that the proposed flats are largely targeted at middle-class professional individuals and couples, who are likely to be under 30 and mostly white British, thus disturbing the more heterogeneous population, both in terms of age and ethnicity, that currently live perfectly tranquilly in the area. This rich and satisfying social mix is characteristic of the borough at large and is an aspect of the borough's population in which the Council should take pride and also take pains in preserving rather than instead erecting a small ghetto of illusory privilege.</p> <p>7. Impact of building works - All building works cause some degree of disruption, but in this case, given the narrowness of the roads adjoining the proposed building site, it is difficult to see how site vehicles and equipment will not cause considerable disturbance as well as very likely infringing areas of the park itself and causing damage to grassed and planted areas.</p> <p>8. Impact on the reputation of the local authority - In summary, the current proposal is wrongheaded and likely to prove counterproductive, as well as fostering considerable opposition and likely to alienate many users of the park and those who live nearby. Those residents I have spoken to are not opposed in principle to the development of the land, or at least some of it, but what they would like to see is something more humane and realistic, with a focus on social housing and community amenities - for example, two-storey buildings aimed primarily at families and with a more generous provision of habitable space, including more provisions for children (such as nursery facilities, safe play areas), and certainly no diminution in all the benefits the park currently provides.</p> <p>At a time when the Council seems keen to promote its award of a Green Flag for Tottenham Green it is paradoxical, to say the least, that regarding Downhills Park it seems anxious to seek a different kind of award - a black flag for eroding a valued provision and thus puncturing one of borough's already barely adequate lungs.</p>	

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	<p>The developers, having completed this development, will presumably simply move on to the next project without a backward look at what it has done in this part of Tottenham. There is little evidence that they have any more longstanding concern for the new tenants than they have so far evinced for those who currently live close to the proposed development site. Pocket Living appears to be a singularly appropriate name for the developers since, apart from planning pocket-handkerchief-sized dwellings, they surely plan to pocket a handsome profit.</p> <p>I trust you will give these points proper consideration and reject the planning proposals as they currently stand in favour of something more fitting to the location and to the needs of the borough's current and future residents. The buzzword that planners like to bandy about these days is legacy, but what this proposal looks destined to be is an embarrassment that will leave the Council without a legacy to stand on.</p>	
	<p>This application should be refused on many grounds not necessarily on order of importance. i) It does not conform to the council's own guidelines. ii) The destruction of a fine Victorian building which could be converted in a manner sympathetic to the surrounding park and other buildings. iii) safety issues around access for fire engines to the site and to Downhills Primary Academy iv) the proposed 'rabbit hutch' dwellings are not what are needed in terms of housing in the area; yes, we need affordable housing, but not this 5 storey (or even 4 storey) monstrosity. v) no provision of desperately needed social housing element. vi) This, if it goes ahead, will have an appalling detrimental effect on the outlook from a much loved local park. vii) allowing the developers to take a section of MOL is a dangerous path, and should not go ahead. The existing access is fine as it is, they just want to widen it for lorries to bring in their ghastly prefab rabbit hutch units. viii) a number of fine trees would be cut down, some of which are protected.</p>	
	<p>I wish to inform the Council planning committee that I object to the Keston Centre development in Keston road on the grounds that:</p> <ol style="list-style-type: none"> <li>1. It is too high 5-storey blocks and even 4 storey blocks is out of character with the neighbourhood. Surrounding neighbourhood is two storeys.</li> <li>2. Density it is too crowded and even contradicts the council own former plans for the area which was 70 flats on the land. See Haringey's Site Allocations DPD, Jan 2016. Site ref. SA60.</li> </ol>	

Stakeholder	Question/Comment	Response
	<p>3. Air pollution. There is no need for car allocation (parking bays) in the development as this would create more air pollution from traffic in the area. The cars would be passing a nursery and there are three schools nearby. Residents do not want more traffic in this area.</p> <p>4. It would wreck our park environment as light and noise from the flats would disturb bats, birdlife and animals like squirrels, hedgehogs and foxes in the park. Our green space is a haven for bats, woodpeckers and kestrels and we pride ourselves in protecting this wildlife. The aggressive development would tower over the park and overlook the children's' play area and the whole park giving it an ugly city feel.</p> <p>5. I also strongly object to the encroachment on the parkland (MOL) in a so called land swap. This is London's green belt and should not be meddled with. The development proposes taking away a 100-year-old border including trees and giving us a piece of land which would create a soft border and mean more break-ins for those living near the development.</p>	
	<p>I object to the proposals on the following grounds:</p> <p>1) The development of four and five storey buildings adjacent to the park will change its character. Their concealment depends entirely upon the maintenance of the screen of mature trees and shrubs within Downhills Park which is the responsibility of London Borough of Haringey and not the developers. The illustrations show the trees in full leaf; in view of the stress caused to trees by climate change and new pests and diseases, the view of the buildings without the vegetation should be shown.</p> <p>2) The description of the wider urban grain pattern does not appreciate that the taller buildings are sited along the main roads, Philip Lane and Downhills Park Road, and mark a hierarchy of scale from shops and main traffic routes down to the lower residential buildings, gardens and open space.</p> <p>3) The introduction of such a large number of dwellings will increase pressure on traffic and local services. The traffic survey has not picked up the use of Downhills Park Road and Clonmell Road as rat runs between Lordship Lane and Philip Lane in the mornings and evenings. The effect of the 'invisible' increase in density in the area due to the permitted development of loft extensions has not been considered.</p> <p>4) The interim travel plan has not included the extension of the St Ann's CPZ to the south of Philip Lane and its further extension, under consideration, to the streets to the north of Philip Lane.</p> <p>5) I note that the design and access statement for the nursery and community centre shows no provision for natural ventilation or window cleaning.</p> <p>6) Roof access of the residential blocks has not been addressed - roof edge protection will add extra</p>	

Stakeholder	Question/Comment	Response
	height.	
	<ul style="list-style-type: none"> <li>- This proposed development is not in keeping with the surrounding 2/3 storey Victorian housing. 4 or 5 storeys are not needed or wanted.</li> <li>- This development will pose a detrimental impact on local residents and family lives, local services, parking, with increased traffic and noise.</li> <li>- It encroaches on the protected 100 year old Downhills Park and its historic boundary in order to improve access. This is unlawful and against Metropolitan Open Land regulations.</li> <li>- Pocket proposals are inappropriate to Haringey's needs - housing is needed for families not single middle earners. The price of the cheapest flat is way above the national average earnings. Haringey needs social housing not what Pocket proposes.</li> <li>- There will be a huge adverse effect on the residential amenity of neighbours. There will be noise and disturbance. Because of the 5 storey height there will be a loss of privacy, overshadowing the park and other housing.</li> <li>- The proposed density is unacceptably high for the area and an overdevelopment of the site. Add to this Pocket make no provision for extra doctors, dentists, transport or anything to benefit the local area.</li> <li>- The visual impact of the proposed development is aesthetically awful and certainly not in keeping with the low rise local area. The proposed development is over-bearing, out-of scale or out of character in terms of its appearance compared with existing development in the vicinity.</li> </ul>	
	I wish to object to application hgy/2016/3309 the proposed development of the old nurseries I am resident at no 5 Keston Road. Parking in the area is already a nightmare The park was dedicated to the people over 100 years ago and should not be stolen by developers in breach of Metropolitan open space regulations The proposed development is grossly out of character both in scale and design Local services are already stretched without another huge development The development does not meet local housing needs but caters for another influx of middle earners from outside the area.	
	I am strongly oppose to the current proposals for the following reasons: 1. The height of the 5 story block does not comply with guidelines outlined in the Haringey local plan,(The Urban character study, Seven Sisters area pg.124). It would dominate that area of the park! It won't enhance the character of the park. At the meeting the Pocket Living Developers said the blocks	



Stakeholder	Question/Comment	Response
	<p>would be screened by trees and we were shown images of this, the images we saw were of trees in full leaf. For the majority of the year the blocks will not be screened. Generally the notion of a park is not defined by there geographical boundaries but by the general vista, they are not walled spaces!</p> <p>2. The existing building, the former school, could be converted and developed into housing which would enhance the character of the whole.</p> <p>3. I am very confused as to why you are not prioritising homes for young families instead of the proposed tiny living units for single, middle earners. These single middle earners will be the future young families of Haringey with no where to live.</p> <p>4. During the meeting with the planners, they were proposing to take an area of the park in exchange for an area in the development. Surely this is counter to Metropolitan Open Land regulations?</p> <p>5. Both my children are of school age and they walked to the local secondary and primary schools, I am worried about the impact of traffic and parking that will pass through what is now a quiet street. Parking in that area is already scarce, it pushes over into my own street (Downhills Avenue).</p> <p>6. When I first heard about pocket living I was led to understand that the developers build "car free" developments but they are proposing car parking for 65 spaces due to poor transport accessibility! I live here, I don't work here or have a car so like the majority of residence I use Seven sisters or Turnpike Lane (both within easy walking distance) or one of the bus routes to get from place to place.</p> <p>7. Recently I received a letter from my local doctors informing me of tier closure in March. I was gutted by this news but now I am really worried about the impact the 126 homes will have on the local amenities in the area.</p> <p>I hope I have made my objections clear, I love my local park (I am sure you feel the same about your local park, if you are lucky enough to have one). Please protect Downhills from the planning application, I urge that this application be refused.</p>	
	<p>I am a concerned resident who is strongly opposed to the development and it's potential impact on the historic park and the infrastructure of the surrounding area. My main objections are in regard of the following:</p> <ul style="list-style-type: none"> <li>- The proposed 5-storey blocks would dominate the view from the park by imposing a stark and brutalist backdrop against the existing natural tree lined border and also have the effect of overlooking the surrounding residential streets of 2 storey houses. This contradicts a clause in the local plan to respect and reinforce the existing low level townscape.</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- The density of the development is too high. This also contradicts the Local Plan. The 126 homes in the proposal, far exceed the 70 homes as stated in Haringey's Site Allocations DPD (Jan 2016. Site ref. SA60).</li> <li>- The proposed density and attributed complement of 65 car parking spaces will increase noise pollution and vehicle emissions accordingly and will have a negative impact on an already congested infrastructure; which would be further compromised by having a single narrow access point for traffic to the development, which can only be reached via existing narrow residential streets.</li> <li>- The area is well served by buses and within walking distance to 2 tube stations, so the inclusion of car parking is both unnecessary and incompatible with latter day policy initiatives to reduce vehicle emissions and car use in the local area.</li> <li>- The development encroaches onto Downhills Park, contrary to metropolitan open land policy and will involve breaching the historic boundary of the park without any consultation with relevant authorities.</li> </ul>	
	<p>I object to this development on the following grounds:</p> <ul style="list-style-type: none"> <li>- Conflicts with local plan allocation</li> <li>- Does not ensure enough affordable housing for local families Impacts on Metropolitan Open</li> <li>- Land Substantially modifies the character of the area, particularly the local green space.</li> </ul>	
	<p>I object to this planning proposal because:</p> <ol style="list-style-type: none"> <li>1) it's way in excess of the height of the neighbouring houses (2 storeys)</li> <li>2) it encroaches on the protected 100 year old Downhills Park and it's historic boundary - against Metropolitan Open Land regulations</li> <li>3) the proposal would have a detrimental impact on local residents and services.</li> </ol>	
	<p>Please consider a more reasonable project as this will affect our lives and environment tremendously. This will create noise, light blockage, visual disfiguration of an old green quiet area and an afflux of people in an area not designed to have such a new influx of people and cars/traffic. Please reduce the scale of your project and don't create car spaces as the traffic in our small road will become unbearable as much as the noise (we are just near the proposed access which is a small passage at the moment and we don't want the car to be taken over). This is a quiet Victorian style area backing up onto a lovely Park and we are chocked, saddened and worried with the suggested horrendous plans.</p>	

Stakeholder	Question/Comment	Response
	<p>I'm against the knocking down of our lovely old buildings and public spaces to create yet another poorly thought out incongruous scheme which will greatly harm the local build environment. What about the pressure on the current local infrastructure? Are we building extra schools, hospitals and other services to keep up with the demand? And what average worker earning 23K a year could afford to buy it? They can't, so who really are these flats with roof terraces, over looking a lovely park, for? Haringey, go on end this app.</p>	
	<p>I believe the proposed buildings are too high. I am a mother of 3 children, 2 of whom attend Harris Academy which is next to Downhills Park. My children along with many others play almost every day in the park and it is a wonderfully green quiet space. From the small playground you cannot see any buildings unless you try really hard. On the swings the children see the tree branches and the sky.</p> <p>There are plenty of ugly underused and ungreen spaces in South Tottenham to develop where a tall building would not adversely affect the area, rather than this. How about the flats between Seven Sisters Road, Elizabeth Road and St Ann's Road which are low rise, have lots of garages full of rubbish and are strewn with broken furniture, glass and condoms.</p> <p>This is a really beautiful peaceful green space which gives so much to children, parents, dog walkers and the general public, including many people who do not get the chance to get out into open countryside. I believe it has a real benefit to peoples well being and that a tall building would spoil it significantly. The proposed car park would also encroach on our space and contribute to noise and pollution which we all have enough of as it is. It seems to me that people living in the flats are likely to be mobile enough to walk to the tube or bus stop and should be encouraged to do so.</p>	
	<p>I am writing to express my concern in relation to this proposed development at the Keston Centre, Keston Road, N17 6PW. Whilst I am not opposed to the development of the site for housing given the chronic need for adequate housing within and beyond the Borough. I am however concerned about aspects of the development that I would like to see considered more carefully as I am not convinced that the current proposal addresses the type of housing nor the local environment adequately. In no particular order but all of importance:</p> <ol style="list-style-type: none"> <li>1. I think the 'swapping' of land &amp; use of MOL sets a worrying precedent for encroachment on parks and absolutely invaluable green spaces. Whilst it may be difficult to object to a 'swap' when there is a</li> </ol>	

Stakeholder	Question/Comment	Response
	<p>net gain to the green space overall, I think the value/quality of the swap has to be more thoroughly considered. The park will be a valuable resource to the development and I think our parks &amp; green spaces must be protected at all costs.</p> <p>2. I find it astonishing that a development that is in walking distance of 5 bus routes, 2 tube stations, 1 overland and 1 mainline station can be considered to have poor transport links. I cannot fathom why there is so much parking allocated to the current development plans given a) the excellent transport links &amp; b) the fact that, in general, Pocket Living developments are traditionally car free given the demographic of their average buyer. It feels very much to me that the car parking allocation is excessive &amp; that there are much better usages of that space within the proposed development. I think that the parking issue should also be looked at more holistically in the context of surrounding streets &amp; the broader problem of parking in the area. Furthermore, we should be encouraging the use of public transport &amp; car free developments.</p> <p>3. The mix of housing provision on the site may not adequately match the demand within the borough &amp; I do wonder about the added pressure on services locally.</p> <p>4. The height of the blocks overlooking the park is a concern. I do think this will affect the aspect of the park, the benefit being primarily to people lucky enough to have an upper floor flat but not necessarily park users.</p>	
	<p>I totally object to the application on the following grounds:</p> <p>1. The park is beautiful and used by many. The suggestion that more parkland will be made available is misrepresentative and nonsense. Less usable space will be available.</p> <p>2. The existing buildings should be protected as I believe they are of historic and social value.</p> <p>3. The proposed buildings are ugly and not remotely in keeping with the surrounding Victorian houses - either in height or aesthetics.</p>	
	<p>My family and I vehemently oppose the Planning Application made by Pocket Living for the Keston Centre. I will be following up this online form with an email to Haringey Planning service detailing my objections.</p>	
	<p>I submitted a performer letter of objection produced by Keston Action Group (KAG), but want to write personally to voice my own further views and to re-iterate my objection, as a local resident and life long user of Downhills Park for over 55 years.</p>	

Stakeholder	Question/Comment	Response
	<p>Whilst I am not totally against development of the Keston Centre site provided it is more in keeping with the surrounding period Victorian/ Edwardian family two storey properties, three where lofts are converted. Ideally a development that retains the existing school building that is part of our heritage. I would therefore request that you push/ vote to <b>reject</b> the above application.</p> <p>The proposal by Pocket Living;</p> <ul style="list-style-type: none"> <li>- Requires enlargement of the existing access road, achieved by a land swap and loss of a well-established and attractive part of the park - adjacent the tennis courts. This should be rejected as loss of the Metropolitan Open Land (MOL) which is London's equivalent of Green Belt. Downhills Park is 100+ years old and as an MOL should be protected and any change to land use rejected.</li> <li>- Is out of keeping with the area and disproportionate in size / height at 5 storeys, which will have major impact on and when viewed from the park (MOL). The impact on the view from the park will be horrendous particularly when the trees are bereft of leaves in autumn/ winter. Summer will not be much better as the trees would not mask the huge impact of the buildings. The loss of the secure boundary and reduction in bushes to create a 'soft seamless' boundary will further heighten the impact of the proposed buildings. The open character of the park must be maintained and protected.</li> <li>- Is aggressive in scale, density and is for profit development, with maximum units squeezed onto a relatively small site. The affordable 'carrot' is not accepted as 80% of market value is still out of reach for the majority of locals as £40k plus would be required.</li> <li>- Contravenes Haringey's own Planning Policy and Local Plan.</li> <li>- Will, given the excessive no of units/density, impact on local infrastructure with increased traffic, pollution, etc., and on amenities e.g. schools, doctors (Philip Lane surgery earmarked for closure), drainage, etc,.</li> <li>- Will result in the loss of trees on the site, e.g large established willow.</li> <li>- Will result in the loss of the existing Edwardian school building, which has heritage value and could be saved/ retained and incorporated into a more appropriate scheme – possibly one by Haringey Council direct to provide suitable social housing.</li> <li>- Over develop the site with excessive dwellings, parking and limitation on amenity space, emergency service access- particularly fire brigade access / turning space, etc.</li> <li>- Will impact on surrounding streets where parking is already at a premium, I often cannot park in my own street.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>- Is purely development for profit over and needs to be rejected, particularly given the high level of local opposition, highlighted by the work of KAG members and the support of local residents, whose views should be taken into account (Localism Act). Heart-felt views, of electors/ constituent members, that Councillor's represent as well as taking into account planning policy and plans that the development ignores.</p> <p>Please consider my comments and objections, in association with the KAG letter I have signed and submitted - which covers the planning policy/ plans/ guidance references that planning officers need to refer.</p> <p>I re-iterate I am not against sympathetic and appropriate development of the site, ideally retaining the existing trees and school building. The current proposal does not do this and is wholly unacceptable, inappropriate, out of character and will impact on and blight the park. I therefore request and urge to ensure the above application is REJECTED.</p>	
	<p>This is not good quality accommodation and will offer a poor standard of living due to the small size of the units and their lack of sufficient light. It also neglects the need for social housing and forms part of the cleansing of Tottenham as the area becomes less and less accessible to our traditional communities. It creates a detriment to the park which it will loom over. Haringey can do better than this.</p>	
	<p>I have lived in Tottenham now for ten years, and moved to this house 4 years ago, specifically to be close to Downhills Park. As such it is a central to the life of myself and my children, as it is to countless other families in the area I am sure. I am all for the generation of affordable housing in Tottenham, and would no way object to developments that I felt were genuinely answering the area's housing needs. However the current plans for Pocket Living do not seem genuinely to cater, and also seem to flout several planning conventions for the sake of squeezing as many flats into a small footprint as possible.</p> <p>The impact it will have on the park in its current form will be huge, towering over areas that my children currently play. The fact that it will also actually take some of the park's acreage in order to provide access for this development is even more unacceptable, and completely against planning conventions as I understand them.</p>	

Stakeholder	Question/Comment	Response
	<p>In my opinion this development is too dense, and will cause irrevocable damage to this central hub of our community, completely ignoring the area's need for a mix of affordable one, two and three bed homes. It seems to me that these shoebox flats are clearly designed for landlords to purchase quickly and cheaply and rent to students and young professionals.</p> <p>If it was smaller, and catered for our community's needs without damaging our park, I would not be objecting.</p>	
	<p>We understand that the area around Keston Road will be part of a CPZ in the near future and as such any development coming forward should be car free as per the normal Pocket Living model. The development is wholly inappropriate to Haringey's housing needs, prioritising single middle- earners rather than young families. The proposed development also prioritises quantity over quality of living units, with numerous substandard single person flats that are no more than bedsits In light of the numerous planning objections outlined above and the detrimental impact on the neighbourhood and Downhills Park, I urge that this planning application be refused.</p>	
	<p>I would like Haringey Council to reject this application on various grounds which have been well expressed by local residents at recent public meetings. In particular I agree with the following concerns:</p> <ul style="list-style-type: none"> <li>- proposed buildings out of keeping with nearby housing, local roads are a good mix of family houses and properties divided into decent size flats for 1 or 2 person households.</li> <li>- buildings are too high and overlook the school</li> <li>- The school and LFEPa have pointed out that access for emergency vehicles is not satisfactory, this is extremely important for the school and also potential residents.</li> <li>- Residents will also require spacious enough access for waste collection, deliveries (increase in on-line purchasing!), maintenance etc. There seems to be too much private car parking space instead of room for large service vehicles, while public transport is good with 4 bus routes all giving access to tube or rail stations.</li> <li>- successful rebuilding of existing Victorian red-brick properties on Philip Lane (no.99 I believe) and (currently under construction) adjacent to shops at Mount Pleasant Road to provide an increased number of flats which blend in with existing buildings, provide a better model for developments.</li> </ul> <p>I therefore urge this plan be refused and an alternative sought.</p>	

Stakeholder	Question/Comment	Response
	<p>I whole-heartedly object to this planning proposal and am deeply concerned by the implications it would have on our local area, public park and the precedent it would set for future developments. Firstly, the proposal is entirely out of character with our neighbourhood, far far greater than any other property currently standing. This huge eyesore of a building would be visually out of place and would bring a vast increase in the local population, along with the inevitable increased traffic and congestion to a very quiet area which is already busy in rush-hour/working day thanks to those working in Wood Green etc using the zone's free parking. There's also the greater risk of crime that comes with a greater risk of population.</p> <p>I am extremely concerned that bulldozing down a fantastic local community centre for children and snipping off parts of our community's park will now only cause the damage with this plot, but allow for future developers to do the very same with similar proposals. Forgive me for sensationalism, but this could quite easily trigger a ripple effect that will see us surrendering local community amenities and local council controlled shared spaces to private foreign investors acting only in the name of self profit.</p> <p>I urge you to reject this proposal, and consider the effect it would have on a longstanding, beautiful public park, on the surrounding communities and neighbourhoods that live there, and the true need for social housing for families, not single unit apartments for middle-class city workers. Now more than ever we should be looking out for each other, not these buy to rent developers. Now more than ever we need to fuel community and natural spaces. For once, let's protect something sacred instead of selling it to the highest bidder.</p>	
	<p>I object to this development on two grounds. Firstly that because of the height of the development it will dominate the park. The drawings presented by Pocket Living show the development masked by the greenery of mature trees. However these trees will be bare for almost half the year. Secondly a strip of parkland will be taken. While I understand that it is intended to be replaced elsewhere, this could easily be the thin edge of the wedge and councillors should be playing a leading role in defending public services, like parks, for residents. Downhills Park is a beautiful and well used open space for families living in an overcrowded part of the borough. Of course, more housing is needed, but this is private housing, probably not affordable for the majority of Tottenham's current residents, and each unit is very small.</p>	



Stakeholder	Question/Comment	Response
	<p>We object to this application which is socially-exclusive (requiring minimum household incomes of £40,000), unacceptable in not meeting minimum space standards, and which contains no really-affordable housing. We believe that on sites like this which are on publicly-owned land, the housing built should be 100% really-affordable, and that this means the Target Rents paid by council tenants.</p>	
	<p>While being aware of the need for housing in London, and in Haringey in particular, I would like to voice my objections to the current plans for housing adjacent to Downhills Park. Some of my objections are as follows: the height of the buildings overlooking the park, the block-like nature of the design, the density of units, the emphasis on smaller units which are not useful for families as the area needs more family-type housing, the impact on the feeling for users of the park-- noise issues, sight-line and light issues.</p> <p>Parks are a wonderful and necessary amenity for London neighbourhoods. Any encroachment on this kind of park that takes away from the feeling of being in an open, green space diminishes it for users of the park. More and more people are now using this park which makes it a safer and more pleasant place for all. The park is a place where social cohesion and community awareness can develop. If housing should be built on the edge of the park, it needs to be designed with that in mind. That means density and height and spacing of buildings needs to respect the openness and light and vista and feeling of the park. Please have this housing re-designed to conform more to something which will blend in with this much-loved and used park.</p>	
	<p>Whilst I do not live in the immediate vicinity of this proposed development, I do live on the other side of Downhills Park, of which I am a frequent visitor, so any changes to the park will directly impact on me and my family. I also live next to another site, Haringey Professional Development Centre, which I believe Haringey is considering for a transformation similar to the Keston Centre. I am therefore taking a keen interest in how the proposals for the Keston Centre develop. I believe that the development runs counter to Local and London Planning policy in numerous areas and on that basis I urge the Planning Sub Committee to refuse permission for this application.</p>	
	<p>I would like to formally register my objection to the proposed development on the Keston Centre Site. I am a local resident who lives on Kirkstall Ave. I have concerns over the scale of this development and</p>	

Stakeholder	Question/Comment	Response
	<p>the removal of parts of the park.</p> <p>The scale of this development is out of character with the local area. There is no provision of improvements in infrastructure e.g. improved transport links, additional parking (it is already virtually impossible to park on the surrounding roads). It will cause additional strains on local school places and local childcare provision - which is already increasingly difficult to find.</p> <p>Whilst I do not object to some form of development on this site, the current proposal of 5 stories does not fit in with the local character and will cause maximum distress to local residents. A reduced number of stories would reduce the negative impact that this development will have on the local community both aesthetically but also during the piling methods that would be needed to support such a structure.</p> <p>I have concerns over the environmental impact assessment that relates to this project. The impact on air quality and noise pollution during construction is going to be very negative for the local school children whose playground is within view of the proposed site. How does this combined with the negative impact on the park (which will reduce the number of users) contribute to any Haringey Health &amp; Wellbeing Agenda? It is presumed that children will have to remain indoors during key parts of the construction process.</p> <p>The building proposed for demolition is also a site of historic local interest and this type of building should surely be able to be retained in some form in a new development. It should not be development at all costs just to put up some blandly designed tower blocks.</p> <p>I also have concerns over pocket parks construction methods. Their chief executive at the Conservative Party Conference stated that they manage to carry out modular construction at their warehouse and they have little need for local support and construction work (how does this tie in with statements on local employment being provided during the construction phase?).</p>	
	<p>I am writing to object to the scale of the proposed development at the Keston Road site. The number of properties contravenes the council's own recommendations and community plan, there has been insufficient thought given to the impact on the local infrastructure and the sheer size of the development will change the nature of Downhills Park.</p>	

Stakeholder	Question/Comment	Response
	<p>I object strongly to the park boundaries being interfered with, as once a precedent is set people in the local area will be at risk of losing even more green space. This is unjustifiable in an area of significant economic deprivation where many children for example won't have access to gardens to play outside and rely on local parks for fresh air and exercise.</p>	
	<p>I wish to object in the strongest term about the planning for the Keston project. My issues relate to;</p> <ol style="list-style-type: none"> <li>1/ Some of Downhills Park (already a well used, busy and small park) is to be encroached on and a large number of new park users would have an entitlement to use the space</li> <li>2/ Having 5 storey building looking over the park and prospectively the Primary Academy next to it is wrong and foolhardy</li> <li>3/ the air quality of the Academy and the surrounding areas will be affected</li> <li>4/ the Victorian sewage pipes underused the past 60 years will be overused by a large amount of waste, water and sewage.</li> <li>5/ Water pressure throughout the area will be affected.</li> <li>6/ The public transport system will have a great many extra users</li> </ol> <p>I understand that the area needs new housing, I don't feel that these private rabbit hutch developments is a proper use of public land. A smaller project with affordable rentable family homes would be considerably better.</p>	
	<p>I am completely against the current plans and have attached my objection letter which highlights in full my reasons for my objection. I understand that there is demand for housing in Haringey, as I too am on the list, however the plans need to be within reasons and not detrimental to the character of the area and the quality of life of the local residents. As long as the height of the housing stays within 3 levels and not 4 storeys + and is not too dense and damaging the views from and over the park I am happy. The scheme also should not take a bit of the Park -all these are all against planning regulations that the Council is obliged to stick to. Even the affordable housing should be of a percentage mix of 1 bed 2 bed and 3 bed not 93 units at 1 bed as in this present scheme.</p>	
	<p>I strongly object to the proposed development of the Keston Road/ Downhills Park site for the following reasons:</p>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- The proposed 4/5 storey flats will create a sense of enclosure on surrounding properties and a loss of visual amenity from the park.</li> <li>- The development would overlook both the park and houses, adversely affecting public green space and ruining views.</li> <li>- The massing is disproportionate to the surroundings – the buildings proposed are too high and should be limited to 2 storeys to avoid such negative impact.</li> <li>- The development blocks sunlight and restricts views.</li> <li>- Car parking spaces should be replaced with cycle stores only in keeping with sustainable values. The increase in the number of cars would cause unacceptable levels of pollution (levels on West Green Road are already high) and noise in a quiet green area used by families.</li> </ul> <p>In spite of the objections, I understand that some development could still happen on the area although hopefully reduced significantly in size. In the event of any development, I feel that more should be done to improve the surrounding streets including:</p> <ul style="list-style-type: none"> <li>- Improvement of park- particularly playground facilities (to provide for increased usage) - to include playground equipment on par with eg. Lordship Rec / Clissold Park / Priory Park.</li> <li>- Repaving of surrounding pavements with stone pavers and new trees planted.</li> <li>- Public cycle storage facilities.</li> </ul>	
	<p>I and my family have been living in this Borough for the past 10 years and have been enjoying Downhills Park. It is an amazing area which gives the opportunity to all residents to relax and socialize with our children throughout the year. We are not against housing and we know that the area is expanding with more residents moving into it and it is unavoidable to keep developing it in order to create more homes for everyone as long as it doesn't affect the views and density of the Park. It is important that the Scheme you are planning does not take any bits of the Park as it is against the planning regulation and the Council must respect this. As stated on many of our previous petitions this Planning will have a negative impact on families and children using the Park due to the lack of privacy created by this big 5 storey block, and a huge impact on traffic in the area. The development is totally inappropriate. For all above mentions reasons we as a family, and resident of this area, kindly ask you to refuse the above Planning application at Keston Centre.</p>	

Stakeholder	Question/Comment	Response
	<p>While we understand the need for more housing in the borough, we object to this particular development on the following grounds:</p> <ul style="list-style-type: none"> <li>- Incursion on a much-loved and well-used local park whose character will be greatly altered if the scheme goes ahead in its present form. The buildings are too high and will dominate their surroundings.</li> <li>- Parking: far too much parking provision on the site in an area which is already very congested and which has ample public transport links.</li> </ul>	
	<p>I refer to two documents produced for the developer by Mark Welby: Arboricultural Impact Assessment and Method Statement, Ref: POC20476aia-ams (AIA) Tree Report, Ref: POC20476tr (TR) I refer in particular to three trees labelled T17, T22 and T23 which, according to the Arboricultural Impact Assessment (AIA), are all scheduled for removal (see AIA para 3.4.1). I refer to the Tree Report as TR. T22 and T23 T22 and T23 are Beech trees. They are both categorised in Appendix 2 of the Tree Report as A1 trees and good quality with high landscape value.</p> <p>TR 1.4 states: Trees of A and B category should be considered as constraints to development and every attempt should be made to incorporate them into any proposed development design. TR 4.5 states: Four trees included in the survey are category A. These are all trees with high individual quality and landscape value.</p> <p>TR 5.1 states: Trees of A and B category should be considered as constraints to development and every attempt should be made to incorporate them into any proposed development design. It seems very clear that for T22 and T23 every attempt should be made to retain them. However it seems equally clear that no attempt has been made to tailor the proposed development to incorporate these high quality trees. Instead the AIA report simply states:</p> <p>AIA states 3.4.2: T22 and T23 must be removed to facilitate holistic development of the site and allow the linear block of terraces to have viable gardens. It is appreciated that that there is little space within the site for any meaningful replacement planting. This is inadequate and I formally object to the removal of trees T22 and T23.</p>	

Stakeholder	Question/Comment	Response
	<p>T17 is a large Weeping Willow. It has been designated as a C1 tree in Appendix 2 with Limited value due to restricted height. Outgrowing location. This is the only reference to this tree in either report. I formally dispute the description of this tree in Appendix 2: It is not clear to me why T17 has limited value due to restricted height. This phrase makes no sense to me what is restricting its height? Yet T17 is also outgrowing (its) location. This is patently untrue as a cursory glance at the tree would confirm. It is "outgrowing" its location but has "restricted height". This appears to be a straight forward contradiction. The real 'problem' for T17 is that it is near the centre of the proposed development. I believe that in both reports the designation of T17 as a category C1 tree is self-serving and not justified. T17 is a beautiful good quality tree with high landscape value and could easily be incorporated into any development with imaginative designers indeed it would make a distinctive feature for a development in keeping with the nature of the area. I therefore formally object to its proposed removal.</p>	
	<p>5-storey blocks is out of character in terms of its appearance compared with the period properties in the area The density of the development is too high The visual impact of the development will have a negative effect on the character of the neighbourhood.</p>	
	<p>The visual impact of the development will have a negative effect on the character of the neighbourhood It encroaches on Downhills Park counter to MOL Regulations.</p>	
	<p>Five storey blocks are too high - should be no higher than the surrounding 2 storey houses. There should be no carving off of Downhills Park. The number of proposed units is 134 and we believe this density is too big for the site.</p>	
	<p>I would like to voice my objections to the current plans for housing in Keston Road. While I appreciate the need for housing in Haringey, as a long term (46 years) resident of the Downhills Park area, I have seen the area crippled by congestion and parking for residents is becoming more of an issue. The provision for parking with this development is not adequate and will encroach further onto our already congested roads. Our park is a wonderful and necessary amenity and used more and more. The need for open space is as vital as housing, and currently Downhills Park is a safe and pleasant place for all. If housing is to be built on the edge of a park it needs to be designed with that in mind. Currently, the proposed height of the buildings is too high and intrusive. Please think carefully about the impact on those in nearby residential streets.</p>	

Stakeholder	Question/Comment	Response
	<p>I am writing to object to the above planning application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out in statute that:</p> <p><i>"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."</i></p> <p>These proposals are contrary to the development plan, material considerations do not indicate otherwise - as such the application should be refused. I outline my concerns with the proposals and its conflict with planning policy in more detail below:</p> <p>1. Over development These proposals represent over development of the site, proposing 126 units, massively exceeding the site allocation, which envisages 70 units. The proposals are therefore in conflict with the site's allocation SA60.</p> <p>2. Scale of Development The development is also too large of scale for its location. Five storeys is completely out of context with the surrounding area. The Council's Urban Characterisation Study recommends that building heights for the site do not exceed 1-3 storeys.</p> <p>There are no surrounding landmark cues anywhere near that scale that would warrant such a height in this sensitive park side location, so far beyond the 2 storeys on Keston Road (contrary to Policy DM 1 B a and b). Currently the beautiful Victorian school buildings (currently Harris Primary Academy Phillips Lane) provide the largest buildings in the area surrounded by 2 storey residential properties. It is appropriate that the school at the heart of the community has this role. The proposals would interrupt and sit out of context with this historic urban form (contrary to Policy DM1 B e).</p> <p>Design Policy DM1 A requires that proposals relate positively to neighbouring structures, new or old, to create a harmonious whole. These proposals do not do this, rather they would be an unwelcome obtrusion.</p>	

Stakeholder	Question/Comment	Response
	<p>It is also particularly concerning where the scale of development dominates the infant playground where the youngest children play. I understand that the school has flagged this as an area of safeguarding concern. As a parent with children at the school this is very concerning.</p> <p>3. Density As noted above 126 dwellings on the site is completely out of character with the surrounding scale of development. Rolfe Judd misinterpret the London Plan density matrix (table 3.2).</p> <p>If you visit the site, it is quite evidently not urban in character. The surrounding buildings, with the exception of the school (which as noted above, is rightly an exception) all buildings are all 2 storey low density, residential; with the park frontage rural in character. The site's relationship to a District Centre is not such that it should justify an exception. The densities sited by the applicant are therefore wholly inappropriate.</p> <p>At present the density is 378 hr/ ha, which is at the upper end of urban (200-450 hr/ha) and within the densities the London Plan envisages for Central area, this is wholly inappropriate on a site of this nature. The proposals are therefore also in direct conflict with Policy SP2.</p> <p>4. Visual Impact on Metropolitan Land As noted above, the proposed development is too big, and as such risks spoiling the amenity value of the Metropolitan Open Land and negatively impacting on local residents. Downhills Park is a beautiful park, a green sanctuary in the area for residents, particularly because it has un-urbanised edges. Draft Policy DM26 - says "development adjacent to open space should seek to protect and enhance the value and visual character of the open land." A 5 storey development on the edge of the park would not do this.</p> <p>The rest of the park edges are tree lined and the park therefore at the moment provides a rural retreat for park users and the ambiance that they are outside of the city when they are in the park. A 5 storey building on the park edge would be completely out of character with the existing MOL and massively detract from the value and visual character users of the park currently enjoy.</p>	



Stakeholder	Question/Comment	Response
	<p>The applicants claim that the development does not exceed the heights of the existing trees maintaining the tree lined edge - however, this is not true because most of the trees aren't close to that height. The impact won't be a tree lined edge - but of an urban jungle. This is wholly inappropriate in this context. These buildings are too high for a site adjoining MOL and should be reduced. It is concerning that a visual impact assessment has not been submitted for these proposals for fully assess the impact on the MOL.</p> <p>London Plan Policy 7.17 is clear that the strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. The proposals are in conflict with Policy DM26 and Policy 7.17.</p> <p>5. Development on MOL Policy 7.17 also states, any alterations to the boundary of MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. Land acquired to create the larger access at present remains MOL - the same very special circumstances tests of building on Green Belt should therefore apply here.</p> <p>6. Design Quality The quality of design is disappointing. The applicants claim that the proposals represent a bespoke response to the site. In fact the design is identical to the Camden Pocket development. Making it clear that the applicant is merely shoe horning an existing design into the Keston Centre site.</p> <p>7. Lack of consideration of re-use of non designated-local heritage asset SAm04 states that the Keston Centre has some heritage merit, and retention of this building should be considered. This does not appear to have been given full consideration by the applicants.</p> <p>Keston Action Group have helpfully submitted evidence showing how the building might readily be reused and retained, alongside development elsewhere on the site. The Council's Urban Characterisation study notes the conclusion of the it is evident that there are unprotected heritage assets in the Borough which are undervalued, poorly protected, and sometimes, being lost to demolition or insensitive redevelopment/alterations. The building is a non-designated heritage asset</p>	

Stakeholder	Question/Comment	Response
	<p>which is in keeping with the scale and design of development on Keston Road and on the adjoining school site. The old brick built building with large windows lends itself well to redevelopment for residential or community use. It is important that this old building of character is not lost to the local community as this would be detrimental to the character of the area. The building should be retained and reused.</p> <p>8. Biodiversity Impact on nature allocations in Downhills Park Development on the site would have a detrimental impact on the existing biodiversity of the park. The local nature allocation runs lordship rec down through Downhills Park along the eastern boundary of the park (adjacent to the site). There is currently mature trees and planting along this boundary, which should not be lost because it used by wildlife. As the allocation site is currently not lit and much of it is currently open, this encourages a lot of wildlife on the site. It is therefore concerning that redevelopment of the site is proposed as this will have a detrimental impact on this wildlife.</p>	
	<p>I strongly oppose the planning application on the grounds that is too high for the given site and spoils the character of the park which is a really important amenity in the area. It will have a negative visual impact on the character of the neighbourhood and encroaches on the MOL regulations. The council desperately needs social housing and housing affordable to local people and this application does not address this need. I feel very strongly that this application is inappropriate on so many levels that it needs to be radically reconsidered.</p>	
	<p>I object to the style of housing proposed for this development. Single bed properties are not suitable for family living. Many more multiple bedroom properties should be included. I also object to the height of proposed buildings which will impose on the open nature of Downhills Park.</p>	
	<p>I use the park every day. The size of the buildings will dominate one of the few green spaces in Tottenham. The trees will provide screening only in the summer months. We need more housing but in this area we need more high quality homes for families and more social housing, not these tiny units. While suggesting reducing car use is laudable, it is not enforceable and there is bound to be a knock on effect of parking in nearby streets. It is already almost impossible to park in the area.</p>	
	<p>I object to the proposal on the grounds that it will place intolerable pressure on local traffic and parking.</p>	

Stakeholder	Question/Comment	Response
	<p>This is an already crowded area as, due to road closures to stop rat runs, it forms one of the only routes from south to north Tottenham. In an area popular with young families the increase in traffic can only be dangerous. The parking situation is currently intolerable leading to regular arguments between neighbours. An increase in cars seeking to park in the area will be frankly explosive. As a family area, the increase in single occupancy units changes the character of the neighbourhood, making it more transitory, giving less sense of permanence and therefore community. Finally the character and appearance of the lovely Downhills Park will be irrevocably destroyed by this enormous block.</p>	
	<p>I totally object to the application in the strongest way. My objections in brief are as follows:</p> <ul style="list-style-type: none"> <li>- The idea that it is creating affordable housing is nonsense.</li> <li>- It takes away beautiful and regularly used park space. The idea that it creates more park space is entirely misrepresentative. I run in the park 4-5 times a week and the area that is cited on the plans makes no difference whatsoever. The erection of the buildings however will have very negative impact</li> <li>- The building works will be very disruptive and have a huge detrimental impact. I personally work from home, as a lawyer, and it will make that very difficult</li> <li>- The proposed housing is ugly and not remotely in keeping with surrounding Victorian houses (I too live in a house which is not in keeping and am happy to admit that it is ugly &amp; no more)</li> <li>- The proposal to now go back to 5 storeys is underhand and the buildings will be even uglier and a total invasion of privacy of those in Keston Road and also park users</li> <li>- The existing buildings are beautiful and should be protected and, indeed could be refurbished and used.</li> <li>- The proposals will mean even more cars in the area having a detrimental environmental impact at a time when it is now almost impossible for residents of Keston Road to park near their homes.</li> </ul>	
	<p>I'm objecting to building of that magnitude. The applicants they don't care about the Park, the Park belongs to the people. Also is the noise and traffic on the near roads. Please think about pollution also it is important. The trees and grass they are our lungs and not building.</p>	
	<p>I object to the proposed changes. It will destroy part of our award winning park It will impact on available parking which is already a problem It will change the growing sense of community that is being fostered in this area High level buildings are not in keeping with the surrounding area and will spoil the concept of getting away from it all in the midst of the city.</p>	

Stakeholder	Question/Comment	Response
	It is good to have more accommodation for people but as there are not many parking spaces on street we have to go round and round in many streets for parking our cars. In the above case it will be much more difficult for parking our cars. On that basis we strictly object to the above construction.	
	<p>I object to the proposal on the ground that it would bring more traffic onto Downhills Park Road. I cannot open my window with the amount of pollution from the heavy flow of traffic ON Downhills Park Road at present. Parking would also be a problem as the roads around here are full of parked cars. I have attended meetings regarding the proposal and it seems to me that the parking on the proposed site is not sufficient.</p> <p>I also object to the height of the buildings as it takes away loss of light and privacy to nearby neighbours, also bringing more noise and disturbance to the area.</p>	
	<p>We strongly object to the proposed development at the Keston Centre on the following grounds:</p> <ul style="list-style-type: none"> <li>- The development is not in keeping with the local area, neither in style nor the number of storeys and will have a significant negative effect on the character of the neighbourhood</li> <li>- The loss of privacy to local residents, particularly those on Keston Road.</li> <li>- The added burden that will be placed on local parking facilities, due to the limited number of spaces provided by the development versus the number of new residents in the area. The on-street parking is already at the maximum capacity, especially in evenings and at weekends. This will be accentuated by additional visitors. Furthermore, this will significantly increase traffic in the local area and have a negative impact on our residential streets.</li> </ul>	
<b>Petition</b>		
<b>212 signatures</b>	<p>We, the undersigned call upon Haringey Council to reject Pocket Living's current proposals for development at the Keston Centre site and ensure that any agreed development in this area:</p> <ul style="list-style-type: none"> <li>- IS in keeping with the surrounding 2 to 3-storey Victorian housing and does NOT contain "mansion" blocks any higher than this</li> <li>- IS in line with Haringey's own Local Plans for the Keston Centre, the local area and London Plan</li> <li>- DOES NOT encroach on the protected 100-year old Downhills Park and its historic boundary in order</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>to "improve access". (We say if the access is too small then the development is too large)</p> <ul style="list-style-type: none"> <li>- IS appropriate to Haringey's needs. We need housing for families, NOT single middle earners</li> <li>- Grants permission for minimal car spaces on site</li> <li>- DOES NOT allow 110 "tiny" pocket flats to be built</li> </ul> <p>Why is this important? The proposed development poses a detrimental impact on local residents and family lives, local services, parking, with increased traffic and noise.</p> <p>The proposed plan of 3 to 5-storey "mansion blocks" is against Haringey's Planning DPD (development document) which states that the area should be 2 to 3-storey housing and that the Keston Centre should contain 70 units, not 126 now proposed by Pocket Living.</p> <p>Downhills Park is protected Metropolitan Open Land (like Green Belt) and, along with other protections, any alterations to it should be undertaken in consultation with the Mayor and adjoining authorities - this has not taken place.</p> <p>Pocket Living proposes to build tiny substandard flats (20% less than GLA's London Plan) for single, so called, "City Makers", setting a detrimental precedent for Haringey.</p> <p>Despite Pocket Living promoting their developments with "secure cycle storage (no car parking)" they are proposing 65 car spaces for the Keston Centre site.</p> <p>Residents call on Haringey's Planning Sub Committee to reject these proposals and wish to see reconsidered plans that are compatible with the area, fit real housing needs, are appropriate to this site and which do not encroach in any way on Downhills Park.</p>	
<b>Support</b>		
<i>West Green Playgroup</i>	<p>I am the manager of the West Green Playgroup, on the Keston Rd site. I would like to show my support in the new development of Pocket Housing, This is the only developers that have had us (The Playgroup) in their plans from the beginning, they have been able to keep us informed of all consultations and will answer any of our concerns about any development that may concern us. We are</p>	

Stakeholder	Question/Comment	Response
	looking forward to having a new setting for the children of Tottenham with the same outdoor space, which as we know that not all children have access to a garden, where they can roam in a secure environment and learn and experience so many new skills, so without Pocket Housing winning the bid for the new development. We would again be in a situation of uncertainty not knowing if we would have a Playgroup to offer the children from vulnerable backgrounds and the offer affordable childcare for our families. Thank you for taking the time to reading this.	
<i>Goan Community Centre</i>	<p>I am writing in support of the proposed redevelopment of the Keston Centre site in West Green.</p> <p>I run the Goan Community Centre on the Keston Centre site. From our temporary building on the site we run lunch clubs, dance classes, Yoga Classes and host religious events. We have let the Hall for affordable parties like weddings and Birthdays. I have met with Pocket Living on numerous occasions to discuss their proposals and the plans to relocate the Goan Community Centre into a new purpose built community centre.</p> <p>The Goan Community Centre is a valuable asset for the local area and unfortunately our current home is now very tired. This can prove difficult for some members particularly during cold spells. Our current facility is lacks sufficient kitchen facilities and is suffering from water ingress. I welcome the proposal to provide a new up-to-date community centre on the site which will adequately serve both the Goan Community Association and the local community. It will ensure that we can continue to serve the local community and the needs of our members. I particularly welcome the fact that the new facility will be wheelchair accessible ensuring everyone can visit.</p>	
	<p>I'm writing this email in regards to Pocket Living building affordable property in Haringey. I was born and raised in Tottenham and I'm currently saving in order to get a place to live. As you can imagine it's extremely difficult because the average deposit for a mortgage is sky high.</p> <p>I don't really want to leave Haringey as I like living close by to my mother but at the same time I don't want to live under her roof forever. I 100% support Pocket Living in using the brownfield site like the Keston Centre to provide new affordable housing in Haringey and I hope you will too. It's a great idea and will help regenerate Tottenham by keeping locals like myself around.</p>	

Stakeholder	Question/Comment	Response
	<p>I thoroughly support this application. The layout will create a legible link from Keston Road to Downhills Park that will improve local permeability. It will be well overlooked and safe with active edges lining the street. The scale and massing is well conceived with the taller blocks located away from the existing houses towards the park edge. I have no problem with 5 storeys overlooking the park. This seems to me to be an entirely appropriate scale for the edge of the park. As a frequent park user I have no problem with being able to see taller buildings from the park. The scale is more urban but its really quite modest for a city. We have to get used to making efficient use of scarce residential land at a sensible urban scale. We are not living in a rural village! The building facades themselves are reasonably attractive and well articulated with what appear to be fairly deep reveals adding depth and shadow. Brick is also a good choice for the elevations at it is prevalent in the area. I also support the mix of unit sizes and tenures and the pocket homes initiative they may help younger and middle income people onto the housing ladder. Its good that there are family sized units in the mix too.</p>	
	<p>I am 100 percent behind the planning permission of pocket living, I'm hoping to buy a property and really hope they are allowed to build in Haringey as I trying to get on the property ladder and I believe this will be a good shout for me.</p>	
	<p>I fully support this build as I want to get my own home.</p>	
<p><i>(7 letters of support with same content)</i></p>	<p>I am writing in support of the Pocket Living application to redevelop the Keston Centre site on Keston Road, N17 6PW.</p> <p>I welcome the plans to provide an additional 98 affordable intermediate homes in an area where there is huge demand.</p> <p>As a Haringey resident and local first time buyer I know how hard it is to become a home owner in the borough. Just 40.3% of residents in Haringey are owner occupiers which is significantly lower than the London average of 49.5%. The housing crisis in Haringey means that the average first time buyer property price is 11.6x the gross average annual earnings in the area, which makes it difficult for local people like me to stay in my community.</p> <p>With Pocket homes only being available to local people and sold at a discount of at least 20% to the</p>	

Stakeholder	Question/Comment	Response
	<p>open market, they help many more people into homeownership. Indeed the opportunity to own a Pocket home on the Keston Centre site could be my only way of owning my own home in Haringey (or even London).</p> <p>Too often the voices of first time buyers like me, who are ineligible for social housing and suffer from an unaffordable private housing sector, are not heard in the planning process. I hope the Planning Committee will consider how important it is to provide homes to own for people on moderate incomes like me, which will enable us to stay in the borough we call home.</p>	
	<p>It has been brought to my attention that Pocket Living want to build a property in Haringey. I support this idea as I'm currently saving and know it will take a very long time to buy a property but with their current scheme I know I will have a better chance in becoming a first time buyer.</p> <p>I've lived in Haringey all my life and hope I can stay close by in order to be closer to my family. My friend has a pocket living property and it would actually be a dream come true if I also had one too. Please do consider their planning permission.</p>	
	<p>I support the idea of the new nursery and affordable housing. I think it will be good for the area as well as for the park.</p>	
	<p>I love this nursery, all my kids have been going here and I think it needs to be kept, and yes we do need more houses as we need a fresh look.</p>	
	<p>I really support the idea of a new nursery in this area. My child is 20 months and I looking forward for her future.</p>	
	<p>My daughter will benefit from the new nursery. I like the plan.</p>	
	<p>Outdoor/indoor space is necessary for the English weather.</p>	
<b>Other Comments</b>		
	<p>In support:</p>	

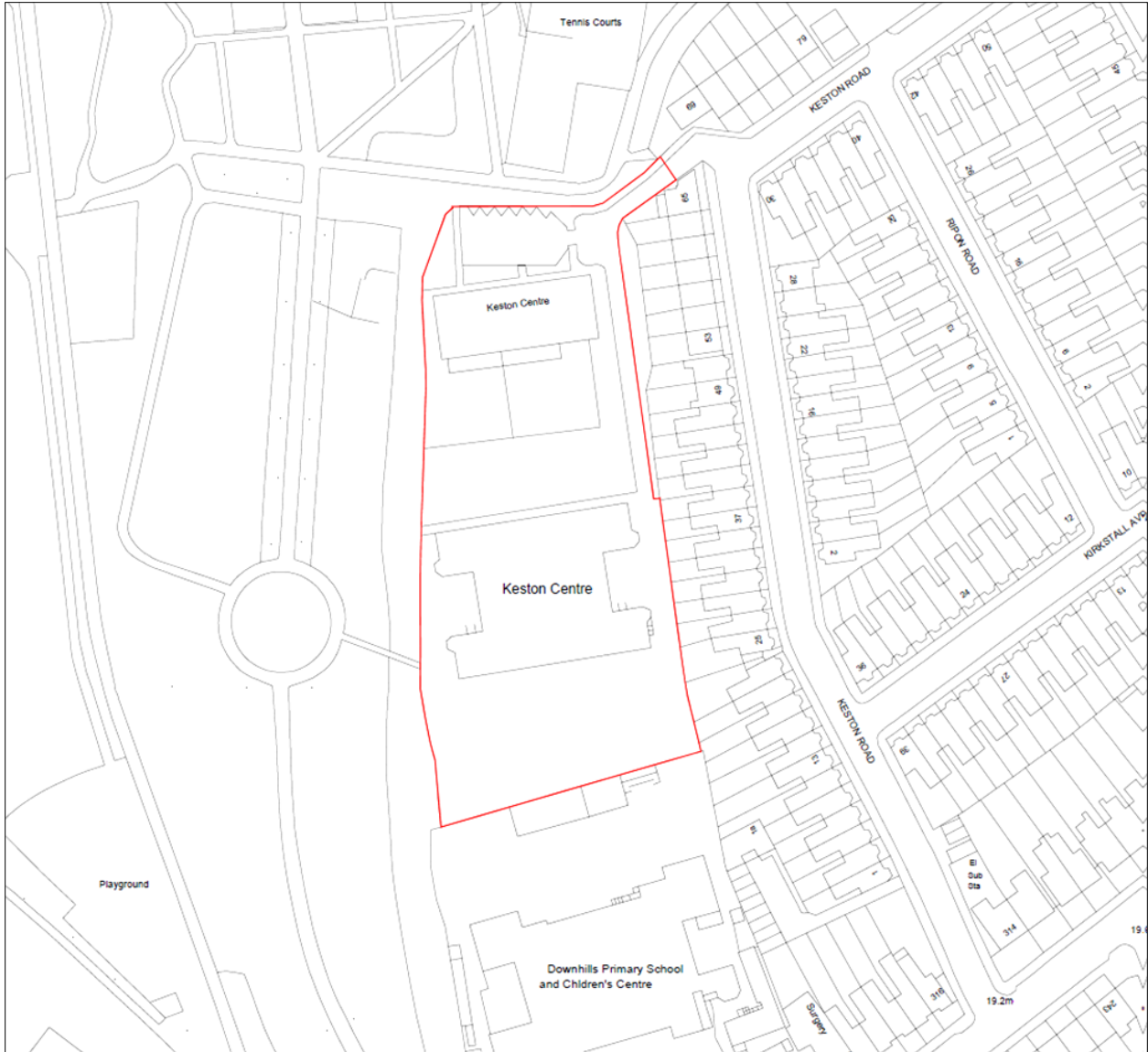


Stakeholder	Question/Comment	Response
	<p>As older long term residents we welcome a mixed community with different ages and backgrounds living together and taking part in the local community. There is a great need for housing of all types in Haringey and that includes housing for young people who wish to have decent housing of their own and make the first steps to enter the housing market.</p> <p>They will want to live independently from their parents or might be coming to work in London. We as long time residents who are now older welcome the provision of housing for younger generations. We experienced low standard rented flats when we were young and future generations are entitled to better than that, quality housing that is pleasant safe and secure and is not detrimental to their health This development will enable single people and couples to get a start and live in reasonable accommodation We think 3-5 storey buildings are acceptable although the planning department must ensure that this is not exceeded. No tower blocks! We think this development will not have any detrimental effect on Downhills Park especially as there will be trees, landscaping and well designed blocks with balconies, varied building surfaces etc In fact this development might enhance the environment of the park. Other parks have housing overlooking them to no detrimental effect.</p> <p>The Keston Road site is mainly derelict at the moment and so putting it to good use for people to have a quality home is to be commended. The addition of the community centre and children's nursery will enhance local community cohesion, especially if effort is made to bring local residents and new residents together Pocket Homes will need to keep to their word to give priority to those who live or work locally and that owners actually live in the homes and not rent them out a high rents to others. The council must ensure that this is included in any decision</p> <p>Concerns: There could be traffic and parking problem. Downhills Park Road is now a very busy road and so if most residents in the development have cars potentially there could be difficulties at the junction of Keston Road and Downhills Park Road. However, as many of the residents are likely to be young they might prefer cycling, walking or using public transport.</p> <p>Pocket Living homes are ideal for single people or couples but they are NOT suitable for families with children. (except for the small numbers of houses included) We have concern that there is a lack of affordable housing for families in the area. If people have jobs (and we hope they will) they will need</p>	

Stakeholder	Question/Comment	Response
	<p>somewhere to live when they start their families. How is the council going to ensure that there will not be families living in the small homes? Where will these new families move to if they wish to stay in the area but cannot afford high house prices?</p> <p>We have concerns that Parks in Tottenham must NOT be used for housing. We have been informed that for this development this is not going to happen (except for the small strip for access road enhancement and this is replaced by a long strip addition to the park, so there is additional park space not less). BUT this must not set a precedent for future local developments. Our parks are precious resources that benefit local residents of all ages.</p> <p>It is essential that if the Council gives planning permission the developers must stick to the plans agreed and not vary or make additions to them like increasing the numbers of homes or storeys to buildings.</p>	

## Appendix 2: Plans and Images

### Location Plan



# Proposed Site Plan



**Aerial View**



**Indicative Visuals**



Entrance Square



The Avenue looking north



Mansion Block



Townhouses



View from Downhills Park (1)



View from Downhills Park (2)





View from Downhills Park (3)

**MOL Land Swap Plan**



## **Appendix 3A: QRP Note – Wednesday 9 November 2016**

### **London Borough of Haringey Quality Review Panel**

#### **Report of Formal Review Meeting: The Keston Centre**

Wednesday 09 November 2016

#### **Panel**

Peter Studdert (chair)  
Stephen Davy  
Esther Kurland  
Wen Quek

#### **Attendees**

Adam Flynn London Borough of Haringey  
John McRory London Borough of Haringey  
Richard Truscott London Borough of Haringey  
Sarah Carmona Frame Projects

#### **Apologies / report copied to**

Emma Williamson London Borough of Haringey  
Stuart Minty London Borough of Haringey  
Nairita Chakraborty London Borough of Haringey  
Robbie McNaugher London Borough of Haringey  
Deborah Denner Frame Projects

#### **Confidentiality**

As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

#### **1. Project name and site address**

Keston Centre, Keston Road, Tottenham, N17 6PJ  
Planning application reference HGY/2016/3309

#### **2. Presenting team**

Matthew Woolgar Pocket Living  
Simon Topliss HTA Architects  
Valeria Meloni HTA Architects  
Jack Dilworth BD Landscape Architects  
Siofra Boyd Rolfe Judd Planning Consultants

#### **3. Aims of the Quality Review Panel meeting**

The Quality Review Panel (QRP) provides impartial and objective advice from a diverse range of highly experienced practitioners. This report draws together the panel's advice,

and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

#### **4. Planning authority's views**

The proposal is for the demolition of existing buildings and the construction of four blocks of flatted accommodation (110 units) in addition to 16 terraced dwellings (of three storeys) to provide a total of 126 residential units, associated landscaping and car parking, and the re-provision of a community facility and nursery in a two-storey building. A small 'land swap' with part of the adjacent park is proposed to widen the access to the site. A planning application was received on 29/09/2016. The applicant has engaged in pre-application discussions with Haringey Council, in addition to which the application has been to Pre-Application Sub-Committee, a Development Management Forum, and a previous QRP. The redevelopment of the site to create a mixed use development comprising residential units, and a replacement community centre is acceptable in principle, and in accordance with the site allocation. The general principle of the layout of the development and the block position is considered acceptable. The overall bulk, massing and heights have been revised and are now considered broadly acceptable. The heights of the buildings in relation to Downhills Park has been a key concern, in addition to the relationship with the rear of the houses in Keston Road, which the applicant has attempted to address.

#### **5. Quality Review Panel's views**

##### *Summary*

The Quality Review Panel offers warm support for the proposals, and highlights some detailed aspects of the scheme with scope for improvement and refinement. They feel that the site represents a good opportunity for development, and would provide a significant amount of affordable housing. They welcome the improvements that have been made to the scheme following the previous QRP meeting. The panel supports the scale of the proposals fronting onto the park, and feels that the central mews is generally proceeding well. They would encourage the design team to reconsider the roofscape of the houses backing onto the existing residential properties on Keston Road to ensure that it avoids an oppressive, industrial aesthetic. They would also welcome some further consideration of both the soft and hard landscaping within the scheme, in terms of the location and nature of pedestrian routes, parking areas and amenity space, and how the boundary between public and private areas are defined. Further details on the panel's views are provided below.

##### *Massing and development density*

The panel supports the scale of development fronting onto the park, and feels that the reduction in scale to the east of the site works well.

##### *Central Mews Street*

The panel welcomes the way that the external spaces have progressed, and feels that potential remains to refine the external environment further; in terms of circulation, parking areas, and the design of hard and soft landscape.

They would encourage the design team to break up the parking areas into smaller zones which have a greater level of landscaping enclosing them, to avoid the central area feeling car dominated.

They would welcome exploration of whether it would be possible to locate an additional square in the middle of the site, enabled through alternative distributions of parking areas across the site.

The proposed individual allotment areas covering the future possible parking spaces look too temporary; potential exists to re-distribute the parking and allotment areas so that the allotments are grouped into a zone across the full width of the street, rather than in a line as currently shown.

Further consideration of the nature and orientation of the landscape 'buffers' adjacent to the blocks would be encouraged; in addition, they should be at least a metre tall.

Paths are important (especially for people with visual impairments), but they do not necessarily need to be very dominant; careful design and detailing of the pedestrian pathways could avoid creation of an implied 'carriageway'.

In this regard, the panel questions the value of a pathway crossing the mews street.

They would encourage creativity within the design and specification of the hard landscape; selection of a higher-quality material for the areas that are currently identified as tarmac would be strongly supported.

Reliance on single materials should be avoided; potential exists to break down the hard landscape into areas of different material/texture that cover the full width.

There may be benefit in locating the Sheffield stands for bicycles in a more visible, central part of the site.

#### *Mews houses and apartment blocks*

The panel feels that the careful design and detailing of the elevation of the rear of the proposed mews houses at the east of the site will be critically important in establishing a positive relationship with the existing residential properties on Keston Road.

The panel would support further exploration of different, richer materials and greater articulation for the roofscape, as they feel that current proposals use a significant amount of metal cladding, lending a potentially oppressive and almost industrial feel to this face of the development.

Additional roof lights/windows at the top of the stairs could help to articulate the roof, whilst also enhancing the quality of the internal accommodation.

The panel notes that the rear gardens to the terrace of houses are shorter than those that they adjoin along Keston Road; they question what potential exists for planting within these garden spaces.

The side and rear boundary treatments to these gardens will be very important; the provision of trellis may allow vertical greening of the small gardens.

Planting to replace and repair existing landscape features would be encouraged.

The panel questions the spacing between the terraces of housing on the eastern side of the site as shown on 3D images of the site.

They note that the communal space to the rear of blocks B and C is very narrow, and would support the sub-division of this land into private gardens for the ground floor units.

#### *Northern section of site*

The panel welcome the improvements to the layout of the north of the site, including the link to the park adjacent to the nursery; they would like more information on the nature and configuration of the link, and the boundary treatments.

The panel notes that the boundary to the nursery garden adjacent will be enclosed and visually impermeable.

Careful consideration of the design of the link and of the entrance to the park is required, in addition to further thought about how the link relates to the community centre, and the canopy adjacent.

This may involve changing the alignment of the entrance to the link, and adjusting and refining the design of the canopy.

The panel were pleased to see that the landscape design would provide visual coherence between different parts of the site.

#### *Next Steps*

The panel is confident that that the project team will be able to address the points above, in consultation with Haringey officers.

They recommend that the design of the rear elevations of the mews houses is refined to improve their relationship with the existing residential properties along Keston Road

## **Appendix 3B: QRP Note – Wednesday 17 August 2016**

### **London Borough of Haringey Quality Review Panel**

#### **Report of Formal Review Meeting: Keston Centre**

##### **Panel**

Peter Studdert (chair)  
Esther Kurland  
Wen Quek  
Charles Wagner

##### **Attendees**

John McRory London Borough of Haringey  
Adam Flynn London Borough of Haringey  
Richard Truscott London Borough of Haringey  
Deborah Denner Frame Projects  
Sarah Carmona Frame Projects

##### **Apologies / report copied to**

Emma Williamson London Borough of Haringey  
Stuart Minty London Borough of Haringey  
Nairita Chakraborty London Borough of Haringey

##### **Declaration of interest**

Esther Kurland is a Haringey Quality Review Panel member and Director of Urban Design London (UDL). Pocket Living and Transport Planning Practice, the client and transport consultants for Keston Centre, are both subscribing members of UDL.

##### **Confidentiality**

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

##### **1. Project name and site address**

Keston Centre, Keston Road, Tottenham, N17 6PJ

##### **2. Presenting team**

Matthew Woolgar Pocket Living  
Simon Bayliss HTA Architects  
Simon Topliss HTA Architects  
Max Kahlen Dyvik Kahlen Architects  
Isabel Pietri Dyvik Kahlen Architects  
Jack Dilworth BD Landscape Architects  
Siofra Boyd Rolfe Judd Planning Consultants

### **3. Aims of the Quality Review Panel meeting**

The Quality Review Panel provides impartial and objective advice from a diverse range of highly experienced practitioners. This report draws together the panel's advice, and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

### **4. Planning authority's views**

The applicant has engaged in pre-application discussions with Haringey Council. The redevelopment of the site to create a mixed use development comprising residential units, and a replacement community centre is acceptable in principle, and in accordance with the site allocation. The general principle of the layout of the development is considered acceptable, however the overall bulk, massing and heights still require development. The heights of the buildings in relation to Downhills Park are of concern, as is the relationship to the rear of the houses in Keston Road.

### **5. Quality Review Panel's views**

#### *Summary*

The Quality Review Panel supports the overall concept of the scheme, which promises a significant contribution to meeting housing needs in the area. They offer broad support for the scale and form of the proposed development, but feel that there are a number of areas that require further consideration. The terraced houses could be designed to respond more to the character of existing houses in streets around the site. They would also encourage further thought about the materials and detailing of the mansion blocks, perhaps drawing inspiration from historic mansion blocks in Haringey. There is potential for the community centre to become an important local landmark, and the panel would welcome a further opportunity to comment on this element of the scheme in more detail.

The panel welcomes the careful thought that has been given to the design of the street, and landscape design. The density of development proposed means that continuing work to balance the needs of residents with the creation of public routes and spaces will be required. In particular, the panel would encourage a more generous public space to the north of the site, next to the community centre, and creative thinking about the design of the mews street. Further details on the panel's comments are provided below.

#### *Massing and development density*

The panel broadly supports the development density of the scheme, but feels that the massing of the north-eastern block of apartments and the terraced houses along the eastern boundary requires further consideration in order to soften the uncompromisingly 'urban' character of the development.

The north-eastern block of accommodation significantly constrains the entrance into the mews, and further work could explore whether some accommodation could be reduced



or re-distributed within the site to facilitate a more generous entrance to the development.

The panel suggests that it would be more appropriate to reflect the local suburban vernacular in the terraced houses, adjusting the massing to two storeys plus accommodation in the roof.

This would start to visually differentiate the terraced housing from the apartment blocks, whilst at the same time presenting a more neighbourly interface to the existing terraces to the east of the site.

#### *Place-making, character and quality*

The panel questions whether the conceptual aspiration to set blocks within a parkland setting has been realised within the proposals.

They note that the gated and potentially dark slivers of amenity space between blocks that accommodate bin stores and cycle parks is not suggestive of parkland.

They would encourage the design team, to increase the levels of greenery and planting on site.

A larger break in the blocks more centrally along the park façade could be one way of achieving a stronger connection to the park.

The panel notes that lighting design has a significant impact on the character and perceived safety of a place; in addition, it can provide a transition between different areas within the site.

#### *Relationship to surroundings: access and integration*

The northernmost route is likely to be the main public link across the site to the park, so the southernmost route will be used primarily by the residents. The potential therefore exists to rethink the public realm strategy at the southern end of the site to maximise its value for residents.

This could enable an increased amount of semi-private amenity space for the residents at the southern end of the site.

The panel suggests that the mews could be designed as a shared surface, avoiding the need for separate footpaths, providing more depth for the planting beds adjacent to ground floor windows of habitable rooms to improve privacy.

They note that the north section of site will be very busy, with a route through to the park and access to the central square with community buildings.

However, the remainder of the site is essentially a large mews, so it may not be necessary to provide a large number of paths and access-ways; a looser approach to access and parking would be encouraged.

They would encourage a greater innovation in the design of the public realm within the development, which would enable greater use of the open space.

#### *Scheme layout and architectural expression*

The panel notes that the architectural expression of the proposals reflects a 'hard' urban architecture, which does not respond to the more suburban character of the surrounding area.

The panel would welcome an approach that introduces variety and lightness within the architectural detail, to soften the contrast.

The panel would also encourage further thought on the roofscape of the apartment blocks fronting onto the park; the flat roofs as proposed do not respond to this key location and the views across the park to the development.

Green roofs and brown roofs should be considered where there is no requirement for PV panels.

In addition, exploration of proposed views from the park into the site should shape and direct the emerging design of the end and corner elements of the blocks.

The panel would strongly support the addition of balconies on the apartment facades fronting onto the park. This would add a level of richness and detail whilst also enhancing the amenity value of the individual units.

The panel notes that single aspect ground floor units are not typically acceptable; they would welcome further thought in terms of how to resolve privacy issues, as suggested above.

#### *Inclusive and sustainable design*

The panel would like to know more about the strategic approach to energy efficiency and environmental sustainability for the scheme as a whole.

The panel welcomes the social aspirations of the scheme, and acknowledges the need for affordable housing in the area.

#### *Next Steps*

Whilst broadly supportive, the panel highlight a number of areas for further consideration by the design team, in consultation with Haringey officers.

The panel would welcome the opportunity to review the proposals following submission of the planning application.

## **Appendix 4: DM Forum Note**

A Development Management Forum for the development proposal at the Keston Centre, Keston Road N17, was held on 20 July 2016.

Over 50 local residents and two Councillors (Cllr Bevan and Cllr Opoku) were in attendance.

The key concerns highlighted at the meeting by residents were parking, the height of the proposed development, consultation and the loss of parkland/MOL.

More specifically, the issues and questions raised by local residents were as follows:

- **Parking and traffic**
  - The parking proposed is insufficient
  - Has underground parking been considered?
  - Parking in the area is limited and already over-subscribed
  - On street parking is used by residents at night and commuters during the day
  - There is no CPZ
  - How will parking spaces be controlled and managed?
  - What happens if demand for car parking exceeds the proposed amount?
  - The additional traffic will cause safety issues
  - Keston Road is not suitable / wide enough for additional traffic
  - Could a zebra crossing be provided on Keston Road?
  - Why is parking proposed when other Pocket schemes have no car parking?
  - Concerns regarding construction traffic
  - Objections to widening of access by taking park land
  - How will car ownership be controlled to limit parking?
  - Clarification sought on parking numbers
  - Is the parking for the community centre sufficient?
  - Is the access wide enough?
  - There should be no car parking
  
- **Height**
  - Five storey blocks are too high
  - Objections to height raised early in local plan consultations
  - Five storeys is too high adjacent to the park
  - Other developments in the West Green Road area have been restricted to the heights of surrounding buildings. Why is this higher than the surrounding buildings?
  - Buildings will overlook the children's play area in Downhills Park
  
- **Consultation**
  - Residents consulted 16 months ago on Site Allocations Development Plan Document (SADPD), and had no response to objections raised
  - Has Pocket been informed of the objections raised?

- Height was a key concern of objections to the SADPD, and it appears these objections were not considered
- Parkland / MOL (*Note: these concerns maintained following explanation of land swap with 45sqm gain to MOL*)
  - Concerns with taking land from Downhills Park MOL
  - Major objections to loss of parkland
  - There are policies in place to protect the openness and amenity of open space
  - There are London Plan policies against land swaps on MOL land
  - Park protection policies are highly important
- Overdevelopment
  - There is already excessive amounts of building developments in the area
  - How will infrastructure, schools, healthcare service cope?
  - Where will these units be serviced from?
- Trees
  - What will happen to the existing trees along the rear of the Keston Road properties?
  - How will these be protected and maintained?
  - How will access be provided to these while maintaining the security of neighbours?
  - Issues with tree behind 29 Keston Road
- Housing types / tenancy
  - Potential for 1-bed units to be used by families, leading to overcrowding and substandard accommodation
  - Concerns with people sub-letting, 'stair-casing' out, buy-to-lets, selling on, and affordability
  - Concerns with high GLA income 'caps', and can these be made more affordable?
- Ownership
  - Needs to be transparency regarding Council ownership and sale vales verses viability
  - Concerns with valuations and resulting amount of development required to be viable
  - Concerns the Council can not sell for less than market value
  - Concerns the site will be lost from public ownership
- Design and layout
  - Concerns with the location, size and design of the flatted block to the north east
  - Extra flatted block should be additional dwellings or left as green space
  - How will the site be secured?

- Is the amenity space for the nursery/community centre adequate? Will it receive adequate daylight/sunlight?
- Is there any flexibility with the scheme, with regard to design, height, units numbers, etc?
- Other
  - Loss of views
  - Noise, traffic noise, loss of amenity of area
  - Are financial documents available or are they confidential?
  - Does Pocket have any examples of schemes built in lower density areas (not just places like Hackney and Camden)?

## Appendix 5 – GLA Stage 1 Response

GREATERLONDONAUTHORITY

planning report D&P/4153/01

19 December 2016

**Keston Centre, Keston Road**

**in the London Borough of Haringey**

**planning application no. HGY/2016/3309**

<p><b>Strategic planning application stage 1 referral</b></p> <p>Town &amp; Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town &amp; Country Planning (Mayor of London) Order 2008.</p>
<p><b>The proposal</b></p> <p>Demolition of existing buildings and re-provision of two-storey building to accommodate a nursery (with associated external amenity play space) and community centre (Use Class D1); provision of 126 new residential units (16 x 3-bedroom part two/part three storey townhouses, and 110 units (93 x 1-bedroom and 17 x 2-bedroom) in 4 x blocks of flatted accommodation ranging from three to five storeys in height); associated landscaping; car parking; widening of vehicular access to site; and provision of new pedestrian access routes to Downhills Park.</p>
<p><b>The applicant</b></p> <p>The applicant is <b>Pocket Living</b> and the architect is <b>HTA Design</b>.</p>
<p><b>Strategic issues summary:</b></p> <p><b>Land use:</b> Redevelopment for residential-led development and community centre is supported; development would not have further impact on openness of Metropolitan Open Land. (paras. 13-15).</p> <p><b>Housing and affordable housing:</b> 126 units proposed. 67% affordable by habitable room (78% by unit), intermediate Pocket Living homes proposed, which is strongly supported. Some variances from residential standards are accepted in light of the high affordable housing offer and overall high design quality (paras. 16-27).</p> <p><b>Design:</b> Design is high quality and proposals are supported. (paras. 28-31).</p> <p><b>Inclusive design:</b> Proposals do not currently provide 10% M4(3) units and the number should be increased accordingly. (paras. 32-33)</p> <p><b>Climate change:</b> Carbon reduction target met and proposals comply with London Plan climate change policy; however further information is required to verify carbon savings. (paras. 34-35)</p> <p><b>Transport:</b> Proposals broadly acceptable, applicant should reduce parking provision where possible, further information on cycling, servicing and construction should be submitted. (paras. 36-40).</p>
<p><b>Recommendation</b></p> <p>That Haringey Council be advised that whilst the principle of the development is strongly supported, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 45 of this report. Possible remedies are set out in that paragraph to ensure full compliance with the London Plan.</p>

## Context

1 On 16 November 2016 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. The Council validated the application on 29 September 2016, but post submission it was identified that a small part of the site was in Metropolitan Open Land, necessitating a Stage 1 referral to the Mayor. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 27 December 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008:

### *Category 3D:*

#### *Development—*

*(a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and*

*(b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.*

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 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](http://www.london.gov.uk).

## Site description and relevant history

5 The site comprises a 0.84 hectare piece of land positioned between Downhills Park to the west and Keston Road to the east. To the south of the site is Harris Primary Academy which fronts on to Philip Road. Access to the site is via an access road off Keston Road to the north. There are also two pedestrian-only access points in the western boundary, providing direct access into the park. Downhills Park is designated as Metropolitan Open Land (MOL) and a 15 sq.m. strip of land at the northern boundary of the proposed application site is also within MOL, as identified in the Council's adopted proposals map.

6 The site is currently occupied by two main buildings. The Keston Centre in the southern portion of the site is a single storey Victorian building formerly in educational use, but has been vacant since 2010. Another single storey building towards the north of the site is in use by the West Green Play Group. At the south of the site is a small portacabin occupied by the Goan Community Association. The site is not within a conservation area. There is a Grade II listed building to the south of the primary school, fronting on to Philip Road.

7 Haringey Council's emerging Site Allocations DPD identifies the site as a key development site in the east of the borough (site SA60). The Council's proposed site allocation as outlined in this document includes residential use and replacement community use. The draft DPD is currently out for consultation.

8 The site is approximately 1 kilometre to the west of Seven Sisters underground and rail station and 1.2 kilometres to the east of Turnpike Lane station. It has a score of 2 on TfL's public transport accessibility level (PTAL) scale (where one is lowest and six is highest).

### **Details of the proposal**

9 It is proposed to demolish the existing buildings and redevelop the site for 126 residential units (including 98 affordable, intermediate homes – 78% by unit and 67% by habitable room) within 4 x three, four and five storey blocks and a row of 2-3 storey townhouses, plus a 2 storey nursery and community centre to the north of the site.

### **Strategic planning issues and relevant policies and guidance**

10 The relevant issues and corresponding policies are as follows:

- Land use principles *London Plan*
- Metropolitan Open Land *London Plan*
- Housing *London Plan; Housing Supplementary Planning Guidance (SPG); Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Affordable Housing and Viability SPG*
- 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*
- Access *London Plan; Shaping Neighbourhoods: 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*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Haringey Local Plan: Strategic Policies (2013), the Haringey UDP Saved Policies (2013), and the 2016 London Plan (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- Haringey draft Site Allocations DPD
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework

### **Principle of development**

#### **Metropolitan Open Land**

13 The development would necessitate the widening of the existing access point in the north of the site, involving the annexation of a small strip (15 sq.m.) of adjacent Metropolitan Open Land (MOL) to facilitate this. The London Plan (Policy 7.17) affords the same protection



to MOL as to Green Belt, and as such, resists inappropriate development on MOL. Development would only be appropriate where it maintains the openness of the MOL.

14 In this case a very small area of adjacent MOL would be annexed to create a wider road access. This land would not be covered with built development and is solely required for access. The openness of the land would not thus be affected. The use and enjoyment of the park would not be adversely affected by the loss of this piece of verge on the outer edge of the pathway. Additionally, the applicant is proposing to gift 65 sq.m. of land on the south western boundary of the application site to the Council to be annexed into the adjacent park. The proposals are in accordance with London Plan Policy 7.17.

#### Community facilities

15 Haringey Council's draft Site Allocations DPD identifies the site (SA60) as being suitable for residential redevelopment subject to the re-provision of the existing nursery and day centre uses. The site currently provides a nursery and temporary accommodation used by the Goan Community Association. The proposals would provide a dedicated community building with 360sq.m. of floorspace, which would house the nursery as well as providing replacement, higher quality space for use by the Goan Community Association. This association has written in support of the proposals. The proposals therefore comply with London Plan Policy 3.16, which seeks to protect social infrastructure.

### **Housing and affordable housing**

#### Affordable housing

16 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units. At the local level, Haringey Council's adopted affordable housing policy seeks to achieve a borough-wide target of 50% affordable housing in new development, although the emerging draft local plan policy seeks a minimum of 40% affordable housing.

17 The application has been submitted by Pocket Living. Of the 126 units on the site, 98 units would be affordable "Pocket" homes, equating to 78% of the total provision by unit and 67% by habitable room. The proposal is the equivalent of 16.3% of Haringey Council's annual affordable housing target (601 units i.e. 40% of 1,502 units), and thus makes a significant contribution to the affordable housing needs of the Borough.

18 Pocket units are sold at a minimum of 20% below the surrounding market rate. Purchasers must earn below the GLA income affordability levels (currently £90,000), not own another property and must live or work in the Borough in question. These restrictions also apply to re-sales and are secured by way of a s106 agreement. Unlike shared ownership, where one can 'staircase' out and ultimately sell their property on the open market (at which point the property no longer constitutes affordable housing), Pocket flats remain affordable in perpetuity as future purchasers are also bound by the eligibility criteria. Unlike shared ownership, purchasers of a Pocket flat own their properties outright (subject to a mortgage) from the outset. On the sale of their properties, residents can benefit from uplift in value although the resales are always subject to the minimum discount of 20% to open market values. Pocket builds principally one bedroom apartments that are designed specifically for single occupiers who want to own their home outright.

19 The affordability levels of the intermediate 'Pocket' units have been calculated in line with the GLA income affordability thresholds of £90,000 household income for all unit sizes, summarised in the table below.

	<b>One and two bed</b>
Equity share purchased	100%
Rent on unsold equity	N/A
Annual service charge (dependent on development, Pocket try to minimise service charges and this is generally circa £100 pcm)	£1,200
Maximum % of net income on annual housing costs	40%
<b>Minimum gross income required</b>	<ul style="list-style-type: none"> <li>• 70% of residents earn less than £40,000</li> <li>• 50% are key workers and</li> <li>• 50% buy with assistance from Help to Buy</li> </ul>

20 The proposed affordable housing component within the scheme would be 100% intermediate. This does not accord with the London-wide target within London Plan Policy 3.11 (which seeks a split of 60% social/affordable rent and 40% intermediate). However, Pocket Living is a company which specifically provide affordable homes for outright ownership and its model is predicated on this basis. In view of the high percentage of affordable homes that would be provided within the scheme, the tenure mix is supported in this instance.

#### Housing choice

21 London Plan Policy 3.8 requires different sizes and types of dwellings to meet different needs. The application is proposing the following mix of units:

Unit size	Private	Intermediate	Total (%)
1 Bedroom	0	93	93 (74%)
2 Bedroom	12	5	17 (13%)
3 Bedroom	16	0	16 (13%)
<b>Total</b>	<b>28 (22%)</b>	<b>98 (78%)</b>	<b>126 (100%)</b>

22 The Pocket Living model is to address the needs of single young professionals in particular. The affordable housing within this scheme is predicated on cumulative cost savings associated with duplication of a standardised unit typology. Accordingly, GLA officers recognise that the heavy weighting towards one-bedroom Pocket Living units is fundamental to the overall affordable housing offer. In light of the overall affordable housing offer, the mix is supported in this case. The proposals also include market family housing which is welcomed.

#### Density

23 The site displays the characteristics of an "urban" site and has a PTAL of 2. The London Plan density matrix (Table 3.2) therefore suggests residential densities of between 200-450 habitable rooms per hectare and 45-120 units per hectare would be appropriate. The proposed

density of the application site is 378 habitable rooms per hectare which falls within the appropriate density range. There would be 155 units per hectare, which exceeds the density range for a site of this accessibility level. However, this is as a result of the large number of one bedroom units within this scheme which are likely to be single-occupancy. It should be noted that an appropriate density is the result of a range of factors, including housing quality, public realm and response to local character. These factors will be further discussed below.

#### **Residential quality**

24 The predominant "Pocket" flat type is a 1 bedroom, 1 person unit of 38 sq.m., which meets the London Plan's minimum space standards (Table 3.3 of the London Plan). Five two bedroom "Pocket" homes would also be provided within the scheme, with an internal floor area of 56-58 sq.m. This is below the minimum floor area (61 sq.m.) for a 2 bedroom, 3 person flat within the London Plan. However, Pocket Living define these units as 2 bedroom, 2 person units which have no definition in the nationally described space standards (DCLG Technical housing standards 2015) or the London Plan. The provision of these smaller two bedroom units meets a specific need which offers more choice for occupiers who would normally be limited to a one bedroom affordable flat. Given the high quality of the internal design offered within Pocket homes, the unit sizes are acceptable. The market units provided would meet the nationally described space standards.

25 GLA officers note that Pocket Living schemes do not typically provide private balconies however they do provide good quality communal amenity space. This has been accepted on other Pocket schemes by other Local Planning Authorities on the basis that the affordable housing delivery is high. In this case, there would be a landscaped, south facing garden at the southern end of the site, and the scheme will also have direct access to Downhills Park, resulting in excellent provision of communal amenity space for residents. The market units will be provided with private amenity spaces to meet the Mayor's standards.

26 The Pocket Living apartment blocks would typically have nine units per floor. This is a departure from standard 12 of the Mayor's Housing SPG which suggests a maximum of 8 units, however given the predominantly one-bedroom, one person unit mix the number of habitable rooms and occupants per floor would be similar or lower to a typical floor with eight or fewer units. No north facing units would be included within the development. The layout of the units is therefore acceptable and would provide good quality accommodation.

#### **Children's play space**

27 Based on the proposed housing mix, the development is expected to produce a child yield of 8 children, of which 4 would be under five. As the child yield would be under ten children, there is no formal requirement to provide on-site children's play space within the development, according to the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG. However it is noted that the development would be provided with communal amenity space, and the site also has direct access to Downhills Park which could provide play facilities for children living within this development.

#### **Urban design**

28 The redevelopment of the site would involve the demolition of two existing Victorian brick buildings. Although the buildings have some heritage value they are not designated heritage assets and are not within a conservation area. The buildings thus have limited protection from demolition

and it is acknowledged that the size and position of the existing buildings would be a severe constraint on achieving a comprehensive development on the site which could optimise the potential for housing delivery. The demolition of the buildings is thus accepted.

29 The new development would be laid out as a series of north-south orientated blocks aligning a central avenue. This is a backland site with no street frontage, and the creation of this "mews" style development is an appropriate response to the site context. The block layout would splay to the south, opening out the public realm in the southern part of the site. The new nursery and community centre would be located in the north of the site with a public arrival square in front of this, creating a legible new public space. As there is no through route to the south (other than the pedestrian routes into the park), it is expected that the residential part of the development and its amenity space to the south would be a quieter retreat from the more public parts of the development. Service uses would be located towards the rear of each block, ensuring that the central street is lined with active uses which would promote a safe and welcoming pedestrian environment.

30 The form and massing strategy is supported. To the east of the central route, 2-3 storey townhouses would align the street. These houses have been designed with a steep mansard to the rear with eaves at single storey level to protect the outlook and privacy to the existing houses on Keston Road. To the western side where the site adjoins the park, predominantly four storey blocks are proposed, with a five storey block to the south. The impact of this height and massing on the adjacent Metropolitan Open Land (MOL) has been considered by the applicant in its design development. The buildings would be set back from the boundary of the site, and their height would be similar to the mature trees on the eastern boundary of the park. Whilst the new buildings would be visible from the adjacent MOL, they would create a backdrop to the park glimpsed through trees, and would not be domineering in these views. The development would not have a harmful impact on the openness of the MOL or the quality and enjoyment of the existing public open space. The proposals would also not impact on the setting of the nearby listed building fronting on to Philip Road.

31 In terms of the architectural design and materials, the development is high quality and officers are supportive of the simple, well articulated facades and the variation in building typologies which will create an attractive place to live. The Council is encouraged to secure key details, including window reveals, balcony treatments and all facing materials, to ensure the highest quality of architecture is built out. The proposals would thus comply with London Plan policies regarding design.

### **Inclusive access**

32 Whilst the applicant has confirmed that all units would meet the M4 (2) standard, the proposal does not currently achieve the minimum 10% provision of wheelchair accessible/adaptable units required by London Plan Policy 3.8. Nine M4(3) units (8x Pocket units and 1 x private 2-bedroom unit) are currently proposed, equating to 7% of the scheme.

33 The Mayor's Housing SPG makes it clear that the Mayor expects disabled people to have the same housing choice and opportunity as people who are not disabled. The aim of Policy 3.8 is to increase the accessible housing stock which exists in London (based on evidenced need via the London Plan Examination in Public EiP). The scheme should therefore provide at least 12 M4(3) units to comply with London Plan policies on inclusive design.

## **Climate change**

34 The applicant has submitted an energy assessment in support of the application. This demonstrates that the proposals will achieve an overall carbon saving of 36% above a 2013 Building Regulations compliant development via energy efficiency savings, the installation of a site heat network linking the four apartment blocks, and renewable energy technology.

35 The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan. Whilst this is strongly supported, before these savings can be verified further information is required regarding the use of mechanical ventilation, as well as further justification for the proposal not to link the townhouses and community centre to the site heat network. The applicant should also show that the use of CHP has been optimised before considering renewable technologies in line with the London Plan energy hierarchy. The applicant should also provide a commitment to ensuring the development is designed to allow future connection to a district heating network, should one become available. The implementation of the final energy strategy should be secured via condition.

## **Transport**

36 The application proposes 54 residential car parking spaces including 26 spaces for the 'Pocket' units (equating to a ratio of 0.26 spaces per unit), and 28 spaces for the 28 private units (equating to a 1:1 provision). The applicant has indicated that the provision of parking spaces for the Pocket units would be staggered based on demand. However, given that Pocket occupiers typically do not own cars, and in the interest of sustainable transport, the parking provision should be reduced. As noted above, however, the number of M4(3) units should be increased to 12, and each of those units would need a parking space. This additional parking could be reallocated from the private unit and the Pocket unit parking. Two spaces for car clubs are proposed near the entrance to the site and each resident will be given free 3 year membership, which is strongly supported as a further means of reducing the need for on-site parking.

37 Seven parking spaces would be provided for the community centre use which is acceptable. A car park management plan should be secured by condition to regulate car parking activity on the site. In addition, 20% of spaces should be fitted with active electric vehicle charging points, with a further 20% passive provision.

38 The 159 long stay cycle spaces proposed for the residential element and 4 spaces for the nursery/community use are in compliance with London Plan policy. The applicant should clarify the security of the cycle parking.

39 Based on the trip generation analysis, the scheme is unlikely to have any material impact on the transport network. Further details on servicing (including how nursery pick-up and drop-off times can be avoided by service vehicles) should be submitted and secured within a delivery and servicing management plan. A construction logistics plan should also be secured by condition.

40 The applicant has produced an interim travel plan for all uses on site. The travel plan encourages shared car trips and the use of sustainable modes based on the surveyed travel patterns of potential residents which is welcomed. In addition to providing free car club memberships, the travel plan should monitor the occupancy of private unit car parking as well as consider increasing the provision of cycle parking subject to demand, as cycling has been identified as a popular travel mode. A full travel plan should be secured through the s106 agreement.

## Community Infrastructure Levy

41 In accordance with London Plan policy 8.3 'Community Infrastructure Levy', the Mayor has agreed a CIL Charging Schedule which came into operation on 1 April 2012. The rate for Haringey is £35 per square metre of additional floorspace.

## Local planning authority's position

42 Haringey Council is still assessing the proposals, and is likely to report the application to its planning committee in January.

## Legal considerations

43 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. 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

44 There are no financial considerations at this stage.

## Conclusion

45 London Plan policies on Metropolitan Open Land, housing, affordable housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms the application does not yet fully comply with the London Plan as set out below:

- **Principle of development:** The redevelopment of the site for residential and replacement community use is supported. The proposals would not have further impact on the openness of Metropolitan Open Land.
- **Housing and affordable housing:** Subject to necessary planning obligations with respect to cost; buyer eligibility restriction and re-sale controls to maintain the affordable nature of the product, the proposed 78% (intermediate) affordable housing offer within the scheme is strongly supported. Given the particular characteristics of this housing product, the high quality of the design and the overall high affordable offer, the variances from some residential standards within the Housing SPG are accepted in this instance.
- **Urban design:** The design and layout of the buildings is supported, and the scale and massing would respond appropriately to the site's context, having regard to the development's impact on the adjacent MOL.
- **Inclusive access:** The application does not currently comply with London Plan Policy 3.8 as less than 10% of the units would be accessible/adaptable for wheelchair users. The number of M4(3) units should be increased accordingly.

- **Climate change:** The proposals are in compliance with London Plan climate change policy; however further information is required in order to verify the carbon savings.
- **Transport:** The proposals are broadly acceptable in transport terms, although there is opportunity to reduce the number of parking spaces to promote sustainable travel. Further details on cycling, servicing and construction should be submitted.

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## **Appendix 6 – Full response from Keston Action Group**

### **Objection Representations**

Planning Application  
Ref: HGY/2016/3309  
Keston Centre  
Keston Road  
London  
N17 6PW  
November 2016

### **1.0 Introduction**

1.1 These representations have been prepared on behalf of Keston Action Group (KAG), a group of 205 local residents, who strongly oppose the planning application submitted by Pocket Living for the re-development of the Keston Centre in Tottenham for residential and community uses. The application was validated by the London Borough of Haringey on 29th September 2016 under reference number HGY/2016/3309.

### **2.0 The Planning Application**

2.1 The application seeks planning permission for:-

*“Demolition of existing buildings and re-provision of two-storey building to accommodate a nursery (with associated external amenity play space) and community centre (Use Class D1); provision of 126 new residential units (16 x 3-bedroom part two/part three storey townhouses, and 110 units (93 x 1-bedroom and 17 x 2-bedroom) in 4 x blocks of flatted accommodation ranging from three to five storeys in height); associated landscaping; car parking; widening of vehicular access to site; and provision of new pedestrian access routes to Downhills Park”.*

2.2 The application proposals are opposed on the following planning grounds:

- Conflict with emerging Local Plan Allocation
- Affordable housing & mix of units
- Local Character & Context
- Impact on Metropolitan Open Land (MOL)
- Impact upon residential amenities
- Highways & Car Parking
- Localism

### **3.0 The Application Site**



3.1 The application site comprises land and buildings extending to 0.79 hectares in area, located on the western side of Keston Road and at the eastern boundary of Downhills Park. It is accessed via a narrow road at the north eastern corner of the site.

3.2 There are two main existing buildings;- the Keston Centre is a single storey brick Edwardian former school building (located centrally within the site; and to the north of the site is another single storey building used by the West Green Play group (nursery use). At the southern boundary of the site, there is a temporary portacabin structure used by the Goan Community Association. These community type uses fall within Class D1 (Non-residential institutions) of the Town & Country Planning (Use Classes) Order 1987.

3.3 The surrounding area is predominantly residential in character and comprises two storey Victorian houses. Downhills Park, immediately to the west, is designated Metropolitan Open Land (MOL) and is a much cherished local recreational facility that dates from 1901. The Park is naturally split into two distinctive areas: the west of the park being the open recreation ground, and the eastern part, closest to the application site, being the more formally laid out part of the park where the play area, tennis courts, cafe and formal gardens are located.

3.4 The application site is 1.2 km away from the nearest Underground Station (Turnpike Lane) but is also accessible to a number of other local rail stations (ie. Haringey Green Lanes; South Tottenham; Bruce Grove and Seven Sisters), all within approximately 1.5km, and has accessibility to good local bus routes.

3.5 It is noted that the application site is included within the Council's Site Allocations Development Plan Document (DPD) as part of their emerging Local Plan (Reference: SA60); it is allocated for mixed use development comprising residential (70 units) and replacement of the community facilities (1,222sqm).

#### **4.0 Assessment of Pocket Living's Proposal**

##### **Conflict with emerging Local Plan Allocation**

4.1 The emerging site allocation sets out the Council's guidelines for the development of this site, with reference to the various development issues involved, including urban design and land use, in order to ensure that a policy-compliant scheme can be brought forward. These guidelines, inter-alia, include that:-

- *Heights should be reduced in the east of the site to respect the amenity of the properties on Keston Rd*
- *Development should respect the neighbouring Downhills Park and not have a detrimental effect on it*
- *The Keston Centre has some heritage significance, and retention of this building as part of a wider development could be considered*

4.2 Furthermore, under 'Site Requirements', the guidance is clear that any impact upon the MOL will need to justify how the benefits provided by the development justify and mitigate any harm that is caused. In terms of quantum, 70 residential units are indicated compared with the 126 residential units that are proposed ie. 56 units in excess of the guidance or 80% more than specified.

4.3 Dealing in turn with the other issues, whilst the heights of the dwellings to the east of the site are shown predominantly as three storey town houses (with the third storey incorporated into the roof), there is a very large three storey block (Block D) to the north of the row of townhouses, which will appear as an unrelenting and huge mass of development as viewed from the rear of the properties in Keston Road. Furthermore, the rear gardens to the town houses appear tiny and with very little spacing provided between the units, such that the existing adjoining residents will experience '*a wall of development*' in very close proximity to their rear boundaries leading to a 'sense of enclosure' and significant loss of their existing outlook. As such, the siting; massing and height of these units can not reasonably be said to '*respect the amenity of the properties on Keston Road*'.

4.4 In terms of Downhills Park, the visual impact will be hugely damaging and harmful. The existing low level built form of the Keston Centre is at present only glimpsed through the existing landscaping at the Park's boundary at a height that is significantly below the various tree canopies. The new blocks of flats, however, proposed to be sited along this boundary, at four/five storeys in height, will completely dominate the skyline and dramatically change the existing views from the historic Park forever. There would be a resultant aggressive and harmful relationship between the new development and the Park, with particular concern highlighted in respect of overlooking to the children's play area.

4.5 It is instructive to note that previous reference to a maximum of 5 storeys in an earlier version of the Site Allocation (SA61; Pre-Submission Consultation Stage, February 2016) was deleted by the Local Planning Authority as a specific response to local objections on height, recognising that any future proposals would need to be properly considered within their local context and that the location of higher buildings in the borough would be guided by their work on '*Potential Tall Building Locations Validations Study*' as part of the evidence base for the emerging Development Plan. The application site is not identified by this document, but rather makes reference to the Council's 'Open Space Strategy – A Space for Everyone' which stresses that views of open spaces from elsewhere should not be blocked by development.

4.6 The applicant's visual representations of the relationship with the Park are wholly misleading and only show a selective summer time view when the trees are in full leaf. KAG have therefore commissioned their own graphic designer's visual images to illustrate the views during the typical autumn/winter months, which they contend is a much more accurate and real representation of what will be experienced on the ground for the majority of the year. The harm to the Park's MOL designation will be dealt with subsequently in this report.

4.7 Finally, under this heading, there is no evidence that the applicant has considered the heritage significance of the existing building as required by the Council's guidance. KAG opine that the existing former Edwardian school building is both characterful and attractive, and is accordingly worthy of local listing status. The building appears to be in physically sound condition and a feasibility for its conversion should therefore have been fully investigated, consistent with the emerging allocation guidance. Subject to viability issues, it could therefore potentially lend itself to a sensitive conversion proposal.

4.8 In KAG's opinion, this attractive low rise building should at least have informed the design approach for a much more sympathetic and sensitive lower density scheme, either new build or part conversion, that would fit in with the prevailing pattern and grain of development within the local area. Such an approach would be ideally suited for specialist housing for the elderly and/or as a special needs educational building. KAG have commissioned a specialist heritage consultant/architect (Eleni Makri of Conservation pd) to provide advice and commentary on the design approach that should be taken; her report is submitted simultaneously.

4.9 For these reasons, it is considered that the application proposals are contrary to the Council's guidance in their emerging Site Allocations DPD.

#### **Affordable Housing & Mix of Units**

4.10 Adopted policy SP2 requires development of over 10 units to meet the Borough-wide affordable housing target of 50%, based on habitable rooms. Proposed changes to SP2 and emerging policy DM13 seek to reduce this target to 40%. Closely linked to this are the targets for affordable tenure split which are based on the Borough's identified affordable housing needs. SP2.6 requires 70% for affordable rent (including social rent) and 30% for intermediate housing. Proposed changes to SP2 together with emerging policy DM13.B seek to adjust this ratio to 60/40.

4.11 The Pocket Living scheme neglects these planning policies by delivering a '*one size fits all*' affordable housing model for the site. The scheme offers affordable housing in the form of purely intermediate affordable tenure alongside a small portion of market housing. The scheme disregards affordable rent/social rented accommodation, which there is evidently a critical need for in the Borough.

4.12 Not only does the development propose a non-policy compliant tenure split, it also fails to deliver the size and mix of housing required by the Council's Housing Needs Strategy. Compliance with meeting housing need is required by London Plan Policy 3.5 (B), Haringey's adopted policy SP2 and by emerging policy DM11.C/D. In particular, London Plan policy 3.8.B emphasises an absolute priority for affordable family accommodation. Paragraph 3.6.1 of the Mayors Housing SPG (March 2016) acknowledges "*There is a particular challenge in meeting the housing requirements of families in need of affordable accommodation, both social/affordable rented and intermediate*".

4.13 The need for family housing is reiterated throughout Haringey's adopted and emerging policies. Policy SP2 states: *"The preferred affordable housing mix, in terms of unit size and type of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up to date assessments of local housing need, as set out in the Housing SPD"*

4.14 The ensuing paragraph 3.2.18 goes into more detail stating:-

*"In order to encourage mixed and balanced communities, the Council will aim to ensure that an adequate mix of dwelling sizes is delivered within new developments, while protecting existing family housing. The lack of family housing in Haringey has resulted in significant overcrowding. Low to median income households with large families are likely to be more affected by overcrowding due to lack of choice of available affordable family homes. Responding to these issues is a priority for the Council"*

4.15 Emerging policy DM11.C 'Housing Mix' is explicit stating:- *"priority afforded to the delivery of affordable family housing"*. Between 2015 and 2020 the Council identifies the following mix of housing to address the Borough's shortages, as contained within Appendix A of their Housing Strategy 2015-2020:-

The mix for Affordable Housing is:

- 15% one bedroom units
- 43% two bedroom units
- 32% three bedroom units
- 10% four (or more) bedroom units

The mix for intermediate housing is:

- 20% one bedroom units
- 50% two bedroom units
- 25% three bedroom units
- 5% four (or more) bedroom units

4.16 The Pocket Living proposal ignores this strategy completely and proposes affordable provision that is entirely skewed towards the provision of small units of intermediate tenure, as follows:-

- 93 x 1 bedroom 1 person (95%)
- 5 x 2 bedroom 2 person (5%)

4.17 This scheme therefore represents a significant departure from the Council's adopted policies and housing strategy. If approved, it would set a damaging precedent that would inhibit Haringey's ability to deliver policy compliant affordable schemes in the interests of creating mixed and balanced communities within the Borough.

4.18 The Council should not be seduced by the eye-catching amount of so called 'affordable housing' offered by the applicants. Rather, it should be considered in the context of their marketing strategy which pitches these '*intermediate*' homes as being

available to 'first time buyers earning up to £90k and living in the borough'. They will not be available to genuinely low income households and clearly will not address the real housing needs that the Borough faces.

### **Local Context & Character**

4.19 The prevailing pattern of development in the vicinity of the application site and immediately surrounding Downhills Park, is predominantly low rise (2 storey) terraced housing with small footprints (see Haringey Urban Character Study, pages 28+116). These surrounding properties are typically set back by a road's width from the Park's boundary. The only exceptions to this are Park View Academy (adjoining the southern boundary of the Park); Harris Academy Primary School (directly to the south of the site) and the application site itself, all of which involve much larger development footprints albeit incorporating significant areas of open playground or car parking.

4.20 Considering these exceptions in turn, it is noted that the Park View School is positioned on substantially lower ground (than the application site) with the main bulk of this building being significantly set back from the boundary with the Park. This set-back, together the lower ground level, results in a sympathetic connection with the Park, from which it is barely visible. The Harris Academy is similarly discreet located at the park's lower section, with only two storeys at its closest point to the park boundary, rising to two and a half storeys towards the middle of the site. Finally, the Keston Centre itself comprises low rise buildings (1-2 storeys) sited on substantially higher ground adjoining the eastern edge of the park. The low key nature of these community buildings sit comfortably within the setting of the Park and are not prominent in any views from it.

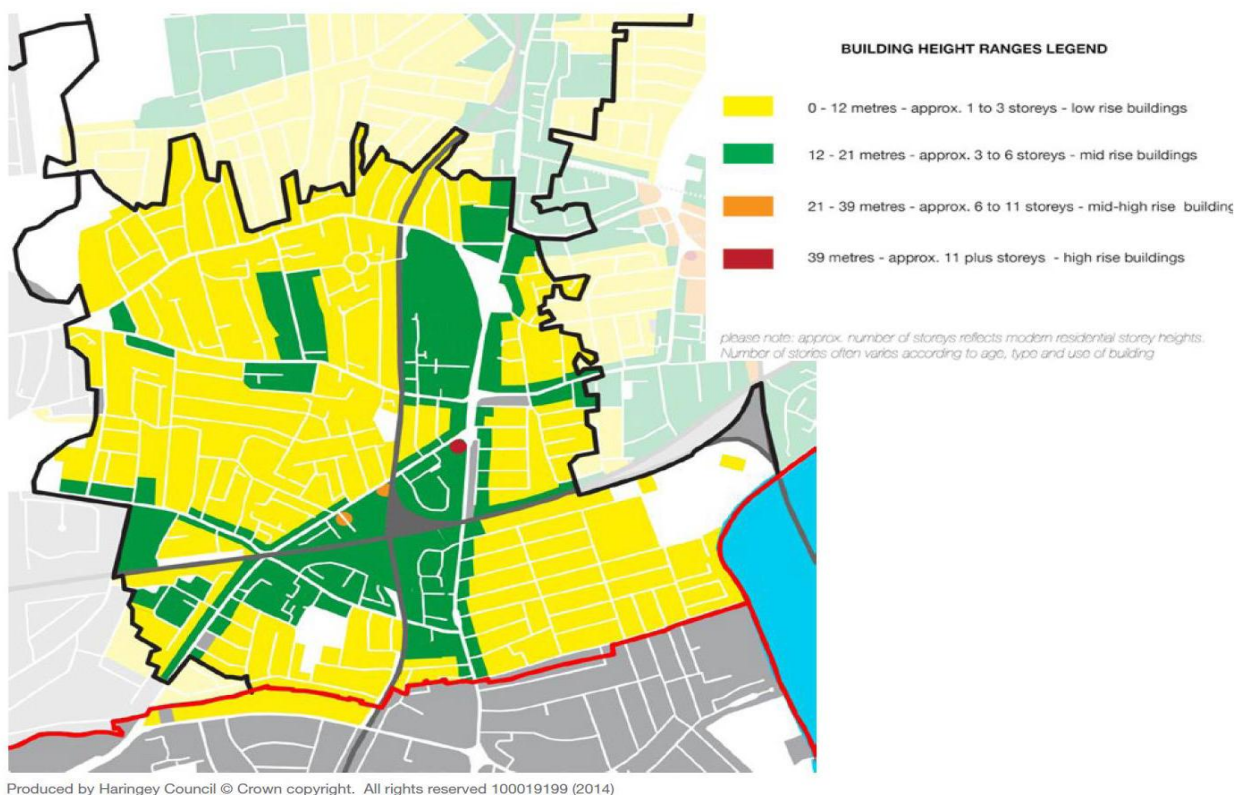
4.21 The context/character of the area is assessed in detail by the Council's Urban Characterisation Study (February 2015). This document is an important evidence based document which in the Council's words is "...one of the key evidence studies to support Haringey's Local Plan, including our emerging Tottenham AAP, Development Management policies and Sites Allocations DPD, as well as future policies such as the planned Wood Green AAP.

*The study helps us identify areas with high townscape or landscape value, to identify appropriate locations for tall buildings and high density, to identify issues adversely affecting the quality of townscapes, to guide the urban design of new development in regeneration areas, and to protect significant vistas and view corridors. We hope that it will also provide a useful resource for those seeking background information on some of what makes different areas of Haringey distinctive, interesting and beautiful."*

4.22 The study specifically notes that the area's character comprises:- "*Predominately low rise townscape consisting primarily of urban terraces laid out on a tight, regular grid pattern.*" (Page 116). It also notes that the age of buildings is Victorian /Edwardian 1840s- 1910s (Page 118) and that the character typology is of 'urban terraces' with '*substantial and consistent areas of urban terraces*'.

4.23 The large blocks of flats that are proposed as the main component of the scheme (at 4/5 storeys in height) are completely at odds with this distinctive existing local character. They will appear as alien and incongruous blocks which will detract from the area's established character and be detrimental to visual amenities. This is supported by Haringey's Character Assessment, which at page 124 of the document, recommends that the site would be suitable for development between 1-3 storeys. KAG agree that development should be at a maximum height of 3 storeys which would respect both local character and the sensitive views from the Park. Expert commentary on this issue is also provided by KAG's heritage consultant (Eleni Makri of Conservation pd) in her accompanying report.

building height recommendations



4.24 Similarly, the dense layout of the proposals will be equally harmful and is incompatible with the prevailing pattern and grain of the local area. This is highlighted by the high resultant density figures for the scheme, as compared below with the London Plan guidance (Table 3.2 'Density matrix') which advises that the relevant density range for the site ('urban areas' and 'PTAL 2-3') is:-

**Units Per Hectare**  
70-170

**Habitable Rooms Per Hectare**  
200-450

## The Pocket Living Scheme Proposes:

158 units/ha

337 hr/ha

4.25 Whilst the application proposals are technically within this mathematical guidance, they are clearly at the highest end of the acceptable range, despite being at the lowest end of the corresponding PTAL range. This should be compared with the emerging 13 site allocation figure of 70 units (SA60) which would more appropriately sit at the lower end of this range reflecting both the site specific sensitivities involved and its public transport accessibility (ie. at 88 units per hectare). The application proposals, at 158 units per hectare, are therefore almost double the site allocation density.

4.26 Furthermore, it should be stressed that the relevant London Plan Policy 3.4 in seeking to 'optimise housing potential' requires developments to take account of the following factors:- local context and character; design principles and public transport capacity. In respect of the latter, London Plan Policy 3.7 encourages large residential developments in areas of high public transport accessibility. The application site does not fall within such an area.

4.27 In addition, London Plan Policy 3.5 requires that housing developments should be of the highest quality internally, externally, and in relation to their context and to the wider environment. Part 3.5.B of this policy states that:- "*The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces*". It goes on to explicitly stress that "*Development proposals which compromise this policy should be resisted.*" In meeting this strategic objective, the policy requires that density and design standards are to be fully considered to ensure the delivery of quality homes.

4.28 The Applicant's Planning Statement seeks to justify the high density figure for their scheme by suggesting it is "*skewed by 93 smaller one bedroom units*". It goes on to allege that the proposal would however result in a less occupants than a policy compliant scheme. The applicant is unfortunately missing the point, since a policy complaint scheme would deliver a more balanced and mixed development that would help address Borough's housing need (ie through the incorporation of larger/family units). Planning by mathematics is never a good approach in any event, but the high density of the application scheme in this case is a consequence of its excessive height, bulk and massing, and the resultant harm that would be caused is a clear sign of over development.

### Impact upon Metropolitan Open Land (MOL)

4.29 The adjoining Downhills Park is designated Metropolitan Open Land; this is a London wide strategic policy (London Plan Policy 7.17) with the same type of restrictions on development that apply to Green Belt land. ie. residential development is

unacceptable and harmful by definition unless very special circumstances can be demonstrated. The application proposals, including a 'swap' of MOL, will have a serious and adverse impact on this designation.

4.30 Firstly, in relation to the MOL swap that is proposed by the applicant, this is clearly not a *'like for like'* situation. The piece of land that the applicant proposes to include within their development site (near the existing access point) currently forms part of an attractive swathe of landscaping (in the form of an historic boundary hedge with damson trees) that is integral to the footpath running through this part of the Park, whereas the narrow strip of land that is offered back comprises an inaccessible strip of hardstanding running along the western boundary of the site. This will change the historic boundaries of the park, which have been in-situ since 1619.

4.31 This issue is covered at page 32 of the London Plan (Chapter 7:- London's Living Spaces and Places) where it is stated;- *'The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.'* Furthermore, the supporting text goes on to state explicitly that:- *'Development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate'*.

4.32 KAG are also very concerned that there has been no proper consultation in respect of this proposed change to the MOL. This is also covered at Chapter 7 of the London Plan where it states, inter-alia at page 31, that:- *'Any alterations to the boundary of MOL should be undertaken by Boroughs....in consultation with the Mayor and adjoining authorities'*. There is no evidence provided by the applicant, or indeed the Council, as part of their disposal process, that such consultation has taken place. The whole principle of the disposal has been opposed by KAG (by 146 local people) and relevant correspondence will be forwarded to the Planning Department and Planning Committee members under separate cover. KAG consider that the proposed land swap is completely unacceptable, as supported by London Plan policy, and will be to the detriment of the Park.

4.33 Secondly, the proposed siting; scale and massing of the new development will create an aggressive and intrusive relationship with the Park. In particular, its western building line, comprising three large blocks of flats, is tight to the Park's boundary and at 4/5 stories in height, the development will be visually intrusive and dominant in views from it. As such, the proposals will clearly fail to protect or enhance the setting of the Park as a whole and in particular its eastern side which is ornamental in its character and of an intimate scale. This character will be drastically changed forever by this insensitive development proposal.

4.34 The Applicant's Planning Statement appears to acknowledge the visual impact issue and its associated harm, but seeks to justify it by relying on the size of existing trees along this boundary which it is alleged would provide effective screening. Visuals



have also been produced to support this assertion. However, these images are wholly misleading in that they only show the summertime view when the trees are in full leaf and the extent of the various tree canopy coverage has clearly been exaggerated. As mentioned earlier, KAG have therefore commissioned their own visualisations which are a more accurate representation. These will be submitted by KAG under separate cover.

4.35 In assessing this matter, the Council have a number of relevant policies that should be applied, as follows:-

Policy SP13 'Open Space and Biodiversity' seeks to "*protect and improve Haringey's parks and open spaces*" and "*Manage the impact of such new developments in areas adjacent to designated open space*"

UDP policy OS5 (Development Adjacent to Open Spaces) requires "*Development close to the edge of Green Belt, Metropolitan Open Land, Significant Local Open Land or any other valuable open land will only be permitted if it protects or enhances the value and visual character of the open land.*"

Emerging Policy DM20: 'Open Space and Green Grid' states that "*The Council will not grant planning permission for proposals for development that would result in the loss of open space, unless an assessment has been undertaken which shows that the open space is surplus to requirement for use as an open space*"

UDP policy UD3.B (General Principles) requires development proposals to "*complement the character of the local area and is of a nature and scale that is sensitive to the surrounding area*"

4.36 KAG contend that the application proposals are contrary to all of these policies. It should be noted that their position in relation to this issue is also fully supported by the 'Friends of Downhills Park', comprising a group of 150 local people.

### **Impact upon residential amenities**

4.37 The applicant has provided extensive supporting specialist documentation to demonstrate that their scheme complies with the relevant BRE standards on 'Daylight and Sunlight'. KAG are not in a position to challenge the consultants' technical findings on this matter, but rather would request that Councillors consider the issue of residential amenity from a broader and common sense perspective.

4.38 In this respect, presently the residents enjoy a predominantly open aspect and outlook across the low level Keston Centre buildings and land towards the Park beyond. This will be replaced by a solid wall of development, comprising three storey townhouses and block of flats, in very close proximity to their rear boundaries, with their existing views towards the Park effectively obliterated.

4.39 The Pocket Living gardens for the townhouses which back onto the Keston Road residents are tiny, creating an unnecessarily mean and tight relationship. This gets even tighter towards the north end of the site where Block D is located which involves a

projecting structure (housing a sub-station and switch room) that appears to be flush to the boundary. The impact of these buildings, in such close proximity, will be hugely damaging for the existing residents, not only in terms of their loss of outlook, but also in terms of the resultant 'sense of enclosure' they will experience from habitable rooms at the rear of their dwellings and in particular from their rear gardens, the enjoyment of which will be seriously compromised. This will be both an unneighbourly and aggressive relationship which should not be countenanced by the Authority.

### **Highways & Car Parking**

4.40 The significant quantum of development proposed will inevitably generate an associated significant demand for car parking and high levels of traffic generation in this location. Whilst the applicant's offer to restrict parking initially subject to demand is welcomed, it is likely to prove unrealistic and the 65 spaces provided will not be sufficient to serve the development, with parking pressures spilling over into surrounding streets. With 9 of these spaces allocated to the community use, it leaves only 56 spaces for 126 residential units (a ratio of 0.44 spaces per unit).

4.41 It is accepted by KAG that this is a difficult balancing act in a location that is far from ideal in terms of public transport accessibility and in the context of attempting to deliver a sustainable development. The tension that is created however is yet another sign that far too many units are being proposed and without a Controlled Parking Zone (CPZ) in place KAG believe that serious highways problems will arise, with the capacity of the local network already at breaking point.

4.42 In terms of the CPZ issue, it is understood that the designation for such a zone in this locality is currently being progressed by the Council. However, until this zone is 18 adopted, the approach taken to car parking by the applicant is premature and destined to be unsuccessful. At this scale of development, KAG opine that the residential element should be completely 'car free' but appreciate that until the CAZ is formally in place this solution is not deliverable, and would be impossible to implement retrospectively from a legal perspective.

4.43 There is also serious concern that there will be inadequate access and turning circle facilities for fire brigade vehicles in contravention of Regulation 5 of the Building Regulations.

### **Localism**

4.44 It is understood that the applicants arranged two sets of consultation sessions with local residents in July and September respectively. The minor design changes that have been introduced as a result of these consultations however represent token gestures only and have done nothing to address the residents' real concerns regarding over-development; excessive height; impact on views from the Park; and loss of MOL.

4.45 It should be noted that KAG have been actively involved in the Council's emerging Local Plan process to put forward their views on the Site Allocation (SA60). This is consistent with paragraph 155 of the Government's National Planning Policy Framework

(NPPF) which stresses that it is essential for Planning Authorities to make early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses. Furthermore, it encourages wide spread pro-active community engagement so that Local Plans, as far as possible, can reflect a collective vision and embrace neighbourhood planning. There is very little point however in KAG engaging in such a process, if once the planning application is submitted, those views that have shaped the allocation are ignored.

4.46 The widespread community concern regarding this application must therefore be given proper weight in the Council's determination of it. Of particular relevance is the NPPF's requirement of the system to *'be genuinely plan-led empowering local people to shape their surroundings'* as one of its core planning principles, as well as the principles introduced as part of the Localism Act 2011.

## **5.0 Summary & Conclusion**

5.1 To summarise, the Applicant (Pocket Living) propose to redevelop an emerging Allocated Site (SA60) at Keston Road in Tottenham. The proposed scheme is for residential and community uses, but at a quantum of units and associated height, bulk and massing that far exceeds the relevant Local Plan guidance.

5.2 These representations have been prepared on behalf of KAG who are strongly opposed to the scheme on the grounds that it is contrary to a whole range of national; strategic and local planning policies as identified within this report.

5.3 In particular, serious harm will flow from the proposals in respect of their damaging impact upon:-

- MOL and Downhills Park;
- residential amenities;
- highways and car parking;
- the local character and townscape of the area; and
- a flawed approach to meeting local housing needs.

In respect of the latter, approval of the proposals would signal a significant departure from key affordable housing policies which would seriously undermine the Council's housing strategy and inhibit the future delivery of genuine affordable accommodation that is desperately needed in the Borough and throughout London.

5.4 For all of these reasons, it is considered that the application proposals fail the Section 38 test of the Act and that the Council should therefore refuse planning permission accordingly.

**Objection Representations:  
Appropriate approach to redevelopment**

(TO BE READ AS FURTHER TO THE REPRESENTATIONS MADE BY MAGENTA PLANNING)

ON BEHALF OF THE KESTON ACTION GROUP

Eleni Makri, BArch MArch(Cons) RIBA IHBC AABC  
November 2016

Objections to application HGY/2016/3309 on behalf of the Keston Action Group (KAG)

**Appropriate approach to redevelopment**

**1.0 Introduction**

1.1 Further to the representations put forward by MAGENTA Planning:

1.2 The KAG does not object in principle to the redevelopment of the site under consideration. KAG would be keen to support the Council's efforts to increase housing and affordable housing supply in the borough and locally, but KAG would expect that this is done in a manner that it would be beneficial and /or harm free to all stakeholders, including the local community and the well established quality of the local amenity and relationship with the park. It is demonstrably the case that in the current scheme there is a clear imbalance which will be damaging to the quality of the local character and amenity, which is contrary to local, London wide and National planning policy. This is the result of the arbitrary character of the proposals which is alien to the locality because of their site layout, design and scale. In the KAG's view these shortcomings can be overcome by development which follows one of the two possible approaches outlining below.

**2.0 Testing the conversion of existing Keston Centre as part of the site's redevelopment (Council emerging site allocation SA60)**

2.1 In the KAG's view, the conversion of the existing Keston Centre former school building which is included in the Council's emerging allocations with a recommendation for conversion as part of the redevelopment of the site should be tested for its potential. There are numerous examples of historic school building conversions in London including Haringey (former High Cross School) which have provided residential accommodation of exemplary quality to award winning standards. The conversion could be supplemented with redevelopment of the land that would take its cue from the adjoining residential streets, in terms of layout, height and palette. If this was found to produce less than the 70 units Haringey has allocated to the site, the redevelopment of the site as a whole could be considered. The principles that would apply to the supplementary redevelopment of the site would be the same as those explained in the

following although siting of the supplementary would have to take into account the existing / converted building and its siting on the land.

### **3.0 Principles of redevelopment**

3.1 The principles of an appropriate and contextual approach to redevelopment of this site, which the KAG would happily support, are explained in the following.

3.2 In the KAG's view, the new residential development should seek to integrate with the local residential urban grain, rather than impose upon it, and this can be achieved by:

(a) Adopting an area derivative site layout and extending the local pattern of residential streets within the site: There are 22 terrace houses abutting the site; there is clearly potential for 22 new terrace houses abutting the existing terraces and a 'new street' to provide access to these and another 22 new terrace houses to abutt the boundary to the Park, both new lots of 22 (total 44) facing onto and accessed through the new street; (note: it is acknowledged that the Council allocation for the site is for 70 units which the KAG accepts; what is advocating by point (a) is how the site capacity can be calculated safely, the number of units within an envelope defined by 44 new houses can easily accommodate 70 units in a combination of flats and houses, or just flats);

(b) Maintaining area derivative heights of development: The local residential townscape is characterised by two storey terrace housing with steep tiled roofs. Its extension should make use of their characteristic envelope to create contemporary designs for the new housing scheme. There are many examples of such cases of contemporary redevelopment where the roof is reinterpreted as a 3rd floor, which will raise the density of the new site to what loft conversions at the existing residential buildings could achieve;

(c) Maintaining area derivative local palette in the new buildings and associated hard landscaping and enclosure: It is important to avoid the arbitrary and to remain referential – which does not mean that contemporary approaches are not appropriate – we are discussing the underlining principle.

3.3 Following key principles (a) and (b) above will determine an appropriate density for the new development commensurate with that in the existing residential streets and would allow for parking issues to be designed in a way that would anticipate a parking management scheme in the locality, which is understood to be in the LPA's intentions for the area. It would be expected that the LPA would be proactive in working matters out with the applicants in this respect. Further following principle (c) would reinforce and enhance the existing which is preferable to competition of new and old and resulting visual discord. Overall, these three guiding principles will achieve the preservation and enhancement of the existing townscape of low rise residential and other development which forms the Setting of Downhills Park. Further, this would be consistent with the historic development of the existing residential streets and educational buildings

between Downhills Rd, Philip Lane and the Park area as traced in the historic maps from 1836 – 1936 submitted with this application.

3.4 The principles for redevelopment advocated above are those that have been followed in successful redevelopments throughout the Country and the KAG wishes to bring to the attention of the Council as an example of integration in terms of site layout, scale and palette, an award winning development in West Burn Lane in St Andrews in Scotland (RIBA National Award 2015), all for ease of reference and better understanding of the points that the KAG has made above. Images of the scheme are attached below.

3.5 It should be noted that some aspects of this application such as the terrace housing in Blocks E-H are observant of the principles for redevelopment advocated above, however Block D is not and there is an element of open land between this block and the existing residential terraces which appears unexplained. Similarly, to Block D, Blocks A-C are completely irrelevant to their context.

#### **4.0 Conclusion**

4.1 In conclusion, the KAG believes that there is good potential for the redevelopment of this site but expects the Council to put in work necessary to make this a successful and complimentary to its context scheme and consistent with the policies that Haringey has approved for the borough and are pertinent to this site. This would then establish appropriate standards for other similar future development in the locality and the borough.