APPENDIX 4: Consultation Responses

Consultee Responses

Stakeholder	Comment	Response
Arboricultural Officer	**Response 14/06/2023** I hold no initial objections to the above proposal. An arboricultural report and arboricultural impact assessment has been completed by Tree Environmental Practice dated 05/04/2023. The report has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition and construction-Recommendations. I concur with much of the report including the tree quality classification. Seven trees have been identified for removal to facilitate the development. Only one tree is a category B tree. Five young trees are to be relocated. There will be some facilitating pruning carried out prior to any development. Providing the all the report and the tree protection plan (drawing 230404-1.2-HCC-TPP-NC) are adhered to and conditioned I see no real issues. However, we will need to know of the replanting of tree numbers e.g. a net gain for loss and the overall planting plan and scheme. **Response 11/07/2023** The planting scheme seems comprehensive and diverse. I can see tree planting to the centre of the design and northeast corner. I still cannot work see how many trees overall	The further clarifications have been responded to with tree planting submitted in supplementary drawing HCC-CTF-ZZ-00-DR-L-500007. Conditions for landscaping, including tree planting and tree protection are recommended.

	are being planted. Since this building is the flagship of the council, it would be good to have this information and push for as many trees as possible. **Response 02/08/2023** The retention and net gain will suffice. Proposed trees and specification can be forwarded.	
Building Control	The applicant and their agents have been engaging with pre app discussions with BC, the majority of which have been focussed on Part B – Fire Safety – we are happy with the proposals to date for both the new build and the refurbishment of the existing building. With regard to Part L, we are given some leeway in that we can vary the requirement as it is a listed building – but we would require a report from the agent justifying the reasons.	These comments are noted and further engagement would be required with Building Control as this progresses
Conservation	<u>Site</u> The Civic Centre is an elongated, four storey grade II listed, nationally important building of historic and architectural special interest. The southern wing of the building, hosting the public uses, has a concrete frame with plate glass curtain walling, whilst the north wing offices areas are characterised by large, regular windows with stock brick infill. The building was designed by architects practice Sir John Brown, A E Henson and Partners who also designed other civic centres between the late 1930's and 1960's. It was inaugurated in 1958 and was the first civic centre of its size to be built after the Second World War while providing a source of inspiration for a new generation of civic centre schemes elsewhere in the country. The project was influenced by the design of Danish city halls of the late 1930's and was exemplary of an understated, informal, and transparent form of modernist architecture characterised by modern frame construction, use of reinforced concrete, largely glazed facades, steel, natural finishes, and attention to detail whose subtle qualities aimed to showcase the freedom of expression and values of a modern local democracy.	Comments referenced within the Committee Report. The concern regarding the loss of the steps is considered to be acceptable when balanced against the positive accessibility impacts. Conditions for listed building consent and planning permission are attached accordingly.

	Its special character and features of interest are comprehensively articulated in the exceptionally detailed listing description published in the National Heritage List for England that reflects the special features of interest and heritage value of this public building. Its architectural interest is summarized in the national listing as follows: * for its clear Scandinavian influence, the subtle qualities of which express architecturally the values of informality, transparency, and modernity, defining aspirations of the post war civic centre as a type. * for its generous planning and creative use of space. * for its elegant and consistent application of high-quality materials and detailing in the principal internal spaces. * for the level of survival of key aspects of the building's character and physical fabric. The listing summary proves that well-preserved design attributes of the civic building such as its siting, plan form, internal and external spatial configuration, architectural language and composition, materiality and detailing concur altogether, without exclusions, to its uniqueness and special interest . The original design for the wider site included an auditorium and a small hall to be positioned along the western boundary of the site, running at the back of the council offices, and connected to these by means of an extension of the colonnaded walkway. The scheme also included a public library to be built at the north of the site, along Trinity Road, thus concluding a group of public buildings revolving around a central square with a pool and terraces. Only the town hall and council offices were built, and while the full extent of the original design intent was never realised, the design quality and character of the then innovative early post-war civic centre have since characterised the site and contributed to the architectural and townscape quality of its area, although with varying public appreciation, as shown in historic pictures of the then recently completed Civic Centre in views along the High Road and from Crescent Gardens. Nowadays the listed Civic Centre sits as one of the finest examples of public buildings of the 1950's and as an architectural landmark at the heart of the Trinity Gardens Conservation Area which encompasses three principal public open spaces, each of	

	townscape and historic interest, which together provide the setting for public buildings and places of worship as well as the setting for houses dating from the early to late 19th century. The listed Civic Centre is surrounded by several listed and locally listed assets that define the historic character of the Conservation Area; in the immediate surrounding of the development site sit grade II listed St. Michaels church located to the south of the development site along the High Road, and the grade II listed Trinity Primary school located to the west and therefore to the rear of the development site and listed Civic Centre. At the northern side of the junction of the High Road with Trinity Road, the former Fishmongers' Arms is a striking corner public house in the Italianate style, built in brown stock brick and stucco, with pedimented first-floor windows and a balustraded parapet. North - south views across the conservation area along its High Road, as well as east-west views along White Hart lane, Bounds Green and Trinity road are important part of the experience of the listed Civic Centre and of the character and appearance of the Conservation Area and its defining institutional buildings. <u>Comments</u> The proposed retention of the civic use of the listed building, its refurbishment and extension, the opportunity to optimise and improve the uses, urban and landscape quality of the wider site which sits in the setting of other listed buildings, all have been carefully considered, tested, and designed by a multidisciplinary team of experienced professionals based on thorough understanding of the original design intent for the site, as well as on the basis of the conditions and heritage significance of the listed building and its heritage setting. Feasibility studies, comprehensive surveys and investigations have been carried out while developing the proposed scheme so to assess the build-up and defects of the listed building; its finishes, original fixtures and detailing have been benefitting from a comprehensive salvage strategy; fundamental asbestos removal, and other preliminary works have been carefully designed and expertly implemented while ensuring appropriate protection of significant fabric and features. The retention of the original public and civic uses of the listed building and its site, the extensive refurbishment, energy efficiency upgrades and retrofitting are welcome in	

	principle as pre-application discussion and related evidence have proven that these works are necessary to bring the listed building back into long lasting, beneficial use. The proposed site layout, new link buildings to the new office building, the proposed landscape scheme, have been informed by the design and character of the listed Civic Centre and have been imaginatively inspired by the original intent for the wider site, while aiming for an authentic, contemporary design to complement the listed civic centre and respect its heritage setting. Proposed new development is also welcome in principle as a unique opportunity to accomplish and enhance the intrinsic architectural and urban quality of the setting of the listed Civic centre and bring its wider site back into optimal use. <u>Internal works</u> The proposed internal works are soundly justified and sensitively designed. • The strip outs, removal of internal partitions and reconfiguration of basement level to host storage and plant equipment space is fully supported as the modest character and ancillary functions of these spaces will be retained and enhanced. • The proposed strip outs and removal of internal partitions to the north wing's offices have been carefully considered throughout the pre-application discussions considering the necessary reconfiguration and upgrades of the original office space according to contemporary working standards. The Council needs independently functioning flexible office areas, that can flex with needs and accommodate new ways of working (NWOW) and cross departmental integration and collaboration. Within this context the upgrading and integration of the office space available within the listed building with the quality and configuration of the new office space offered by the proposed extensions is fundamental for the optimal and integrated use of the civic hub for the Administrative Office Functions of the council. It has been acknowledged that the cellular spatial configuration of the northern office wing forms part of the original design intent and appearance of the Civic Centre, as mentioned in the listing section related to the plan form and internal spatial arrangements of the listed building. However, the office wing was altered and impoverished at various stages and has generally modest finishes, progressively towards the north end of the building: the aesthetic, historic and communal values	

	attached to the interiors of this wing are considered medium/low as it is their contribution to the overall significance of the listed building. It is desirable in principle to retain these components of significance as any level of harm to heritage significance is undesirable in principle. Accordingly, the proposed retention of those most valuable, panelled offices still surviving to ground, first and second floor, coupled with an informed and sensitive reconfiguration of the axial office wing aimed at unveiling and enhancing its original design intent and related spatial and architectural qualities, is a positive design response that, depending on its details, can successfully sustain the legibility of the original design and significance of the listed building. The overall energy improvement strategy will require careful removal and reinstatement of timber panelling from suitably experienced heritage contractors, as per relevant statements supporting the application, so to achieve the desired improvements with minimal alterations to the internal spatial configuration of these representative rooms. • Strip off and demolition works to entrance hall and south wing will sensitively reinstate to ground floor a well-connected, flowing internal configuration, and will retain finishes and decorative features of the most significant public areas by decluttering them from later partitions, storage, and doors. These works will be essential to reinstate and reinforce the original character of the public spaces of the Civic Centre and are very welcome. • The proposed enclosure of the colonnaded walkway running at the back of the Civic centre will tie the uses, circulation, and spatiality of the Listed building together with the proposed new link building and new office building to the north of the site. The enhanced use of the colonnaded walkway, its transparency and visual connection to the proposed internal courtyard and new landscaped gardens to the south of the site are consistent with the character and design principles of the host building and appear as an elegant, flowing architectural gesture to convey the qualities of the civic centre within the new extensions. • The proposed refurbishment of the gallery at first floor above the colonnaded walkway and including the panelled committee rooms and mayor parlour is proposed	

	to be refurbished and allowance for localised removal of severely decayed heritage timber joinery in the Committee Rooms are supported. • The refurbishment and services upgrade in the Council Chamber and related public gallery, where many of the key features of interest, historic fabric and character still survive and are still relatively well preserved despite the asbestos removal works, are certainly necessary to reinstate the optimal use of the civic and democratic functions of the building and are welcome. • The extensive strip off, demolitions and sympathetic rebuilding of the top floor of the Civic Centre including the roof plant rooms are robustly justified by the severe state of decay and asbestos presence on this ancillary floor that hosted the staff canteen. <u>External works</u> Proposed works to the external elevations of the Civic Centre rest on detailed surveys and specialist analysis of the pre-cast stone cladding panels, cast concrete for window heads and the 3rd floor cornice, and facing brickwork. External works are fundamental to restore the good state of repair of the building and its aesthetic qualities, but also to improve its energy performance as a basis for successful retrofitting. • The condition survey of the façade has shown that where cast concrete is damaged it appears to have been cast using an ungraded poorly compacted backing mortar faced with a finer finishing mortar. The irregular compaction and aggregate ratio of the mixes has allowed the migration of moisture through panels leading to oxidisation of the reinforcement and subsequent failure of the panels. The condition of the pre-cast panels is generally poor with signs of on-going failure due to corrosion of embedded reinforcement, erosion and break down of the facing mortar and of previous repairs. The attempted historic repairs are of low quality in a deteriorating condition or failed completely. Metal restraint fixing slots were found to be corroded and in need of replacement. Besides their intrinsic poor quality and inherent defects, the pre-cast panels are potentially at the end of their serviceable life, and the specialist survey recommends full replacement with new pre-cast panels allowing for the introduction of insulation.	

	• Recommendations include concrete repairs to the entire length of the 3rd floor cornice and removal of the extremely deteriorated 3rd floor cladding to be replaced with the same solution intended for the 2nd , 1st floors and at ground level. • The condition survey also reports that Facing brickwork appears in reasonable condition with isolated fracturing on the North and East elevations where pointing appeared to be sound with minimal evidence of historic replacements. There are more significant fractures and subsidence affecting brickwork on the West elevation. Fractures and subsidence have damaged the fire escape fixings which are no longer providing restraint to the staircase. It is recommended further investigation and structural engineer consultation is carried out to determine the cause and develop an appropriate repair strategy. • The rendered areas of the facade to the West wing are in poor condition with cracking in areas which require further structural investigation. New render should consider. any movement joints required in the façade of the West wing to minimise the risk of future cracking. • Travertine marble cladding panels have been used to clad columns and facia on the East elevation. There were signs of minor displacement observed to low level panels, but these appeared to be restrained. Some cracked tiles require replacement, and a general cleaning is recommended as well as possible re-fixing of the larger cladding stones at the canopy columns which appear dislodged. • The specialist survey recommends developing a Planned Preventative Maintenance strategy including a 5-10-year cycle of surveys following completion of the masonry works to maintain the fabric and long-term integrity of external masonry and helping to reduce the frequency and cost of future possible repair. • The proposed repair works to stone cladding, concrete elements, brick masonry and replacement of the pre-cast concrete panels are soundly justified and are necessary to protect the building from further decay, also to enhance its thermal	

	performance and to ensure its optimal and continued use. Accordingly, these works are welcome in principle from the heritage conservation perspective although the proposed energy efficiency enhancements will lead to some degree of departure from the original design and depth of the concrete cladding. Considering the important yet subtle architectural qualities of the listed building, including its lightweight, largely glazed facade currently surrounded by a perceivably coplanar concrete cladded frame, any necessary departure from the original design and aesthetic of the concrete facades will need to be minimized and harmonized with the design and proportions of the windows and curtain wall replacements, and would be considered acceptable from the heritage conservation perspective. The need and benefits of the proposed replacement panels as part of an effective set of energy efficiency improvements forms part of the council sustainability experts' assessment. Further details of the proposed repairs, and replacement panels will be necessary at condition stage to ensure that any impact deriving from this set of works is minimized through good design and that the original aesthetics and proportions among the various components and materials of the façade are respected. • The aluminium curtain walling and steel windows at all levels are single glazed and are in poor condition. It is therefore proposed to fully replace these elements due to their negative impact on the overall thermal performance of the building, including perceived glare discomfort and heath gain due to solar film applied to most of the existing windows. These original glazed elements are key features of the original design and character of the listed building, strongly characterise its architectural composition and the aesthetics of both facades and internal spaces and require a clear and convincing justification for their total loss and full replacement. The replacement proposal has thoroughly considered the finding of the ASWS window survey that evidenced how from the technical perspective, full refurbishment and potential enhancement of the existing steel windows is possible. The report suggests that a full replacement is also technically possible, but also stresses the issues associated with a poor energy performance and presence of asbestos. The ASWS report also evidences the decay conditions of the aluminium windows which are largely beyond repair and advises that sympathetic replacements should be pursued and is accepted form the heritage conservation stance.	

	The enhancement of the energy performance and overall comfort of the building are important considerations and have been balanced throughout the design process with the need to preserve the building and its original features from harm. The application stresses how important is to also replace the steel windows to achieve the maximum and most consistent level of thermal efficiency improvements, and the proposed full replacement of steel and aluminium windows and curtain walling with very similar replacements that respect the overall composition and aesthetics of the host building can be acceptable if it successfully delivers energy efficiency improvements as per the council sustainability experts' opinion. • The proposed demolition of the front entrance steps and reconfiguration of the access through a central ramp to replace the steps is based on an Accessibility Statement form Buro Happold that indicates the noncompliance of the existing 1990's access ramp with current requirements and advises on the technical feasibility to run new ramps or slopes left and/ or right away from the front doors. It is understood that a new ramp located to the right-hand side of the existing entrance will need to be long and convoluted to retain two malus trees. However, the Statement discards the ramp located to the left of the entrance, where a ramp already exists based on the impact to the frontage of the Civic Centre due to the associated lengths of walls and railings which must be provided. This justification for the harmful redesign of the existing entrance, whose relevant feature has always been the uncluttered design, raised access level and soaring silhouette of the canopy, is therefore based on aesthetic impact of the new ramp on the facade of the listed building. No technical justification for discarding the replacement of the current ramp with a new and compliant ramp is provided. Which, from the heritage conservation perspective confirms that it is technically possible to provide dignified and inclusive access into the building without causing further alterations with associated loss of original design and features on the listed façade. • The existing 1990's access ramp, as much as very utilitarian addition, has still allowed to retain so far, the original design of the entrance and hasn't introduced a totally uncharacteristic symmetric composition of the entrance as the current proposal. This element of the proposal has been discussed at pre-application stage focusing on the important to satisfy universal access needs while maximising retention of original	

	design and minimizing alterations to well-preserved, defining architectural features of the listed building. • The application unconvincingly proposes the total reconfiguration of the existing entrance, including an asymmetric couple of uncharacteristic side plinths to both side of the proposed central ramp and raises concerns that unnecessary harm will be caused to the main elevation of the listed building. Therefore, this element of the proposal cannot be supported. <u>New extensions</u> There is no objection in principle to the proposed new link buildings, the new office building located to the north of the site and related landscape scheme, and the conservation position concurs with the comments and consent conditions provided by the urban design officer. The submitted accurate views of the proposed development at Haringey Civic Centre as seen in relevant views of the listed site across the Conservation Area, show how the extension to the listed building will complement the scale, overall proportions and architectural language of the Civic Centre and its conservation area setting while retaining the legible primacy of the listed building along the high road and while providing much needed and state of the art office and civic spaces on a currently underutilised Site. The proposed new development is promising and will very likely have a positive impact on the setting of the Civic centre, surrounding listed buildings and its conservation area. However, detailed building and landscape design are fundamental to ensure that the new development delivers all its design potential, where the design of highly visible and prominent built elements, such as the crowning plant enclosure that will define its roofline will need to be carefully detailed to elegantly complement the roofline and silhouette of the civic centre and surrounding heritage assets. <u>Conclusions</u> The proposed refurbishment works and extensions to the Civic Centre are welcome in principle as opportunities to bring the listed building back into beneficial use and as promising enhancements to the setting of heritage assets and to currently underused site. Further details of the proposed works will be necessary to ensure that any impact is fully mitigated through the most appropriate and detailed design solutions and the	

	proposed scheme is therefore largely supported with the exclusion of the proposed reconfiguration of the access to the main entrance.	
Design	This project is to restore the original Wood Green Civic Centre, a Statutory Listed Building (Grade II), built in 1959, a substantial extension that will only lightly touch the existing, largely in place of the existing Civic Centre surface carpark, "the annex", and landscaping to the remainder of the site, and these comments will consider the design qualities and issues of each part of the proposed works in turn. **Restoration of the Existing Building** 1. Works to the existing Civic Centre are to bring it back into its existing use as the civic headquarters of the local council, including housing civic functions, public and private meetings (including the crucial Council Chamber), customer services and some of the council's office space needs, the rest being accommodated in the proposed new build works. One of the great virtues of this proposal strategically is bringing these civic functions back to their originally intended home, with most of the council's functions housed on site in either the restored existing Civic Centre or in the new annex. The applicants point out that the existing Civic Centre was an incomplete masterplan, with further accommodation to the west and north-west of what was built never started. The new build elements occupy some of the space intended for these, and only connect to the existing building in the two places where the unbuilt original plans intended to connect, and which were left in temporary rendered finish. 2. It would not be expected that the requirements of the council in the 2030s will be the same as it was in the 1950s, and the precise form will be modernised accordingly. In particular the project aims to provide much more community space, much greater openness and accessibility, whilst also accommodating greater security requirements. 3. Detailed comments and analysis of the building heritage conservation qualities of the proposals and how they impact on the heritage significance of the Civic Centre as a Listed Building, that is also in a Conservation Area, are provided by the Council's Conservation Officer. These Design Officer comments can be taken as supportive of those comments and where possible providing further detail on design.	Comments noted.

	Alterations to the External Envelope 4. The restoration works require extensive repairs and in many cases replacement of original fabric, especially of concrete subject to decay, spauling and rusted reinforcements. The intention is it will be replaced with Glass Reinforced Concrete (GRC) panels with insulation behind, to take the opportunity to significantly upgrade the existing building's thermal performance over the uninsulated existing. The applicants promise this will closely match the original appearance of the existing concrete and have similar or better aging and weathering performance and appearance, and have shown extensive research and precedents to demonstrate this will be the case. Its initial appearance can and should be further secured by condition on approval of physical materials samples, which should be carried out on-site against a good (less weathered) example of the existing concrete. 5. Existing windows and curtain walling are generally solid aluminium or steel frames containing single glazed glass, far below the thermal performance expected in modern buildings, as well as creating condensation problems. In principle designs have been devised for new thermally broken aluminium mullions and double glazing, which should achieve a good match to the existing, although this should again be subject to a condition requiring approval of samples on site. The Council's own very recent experience (both as applicant and for planning officers) at Hornsey Civic Library and the architect's recent previous experience at very similar replacement curtain walling at ARK Putney Academy demonstrates good replacement can be achieved. 6. The thickness of the proposed GRC cladding and height of certain parapets, will not be exactly the same as their replaced existing equivalents, but will be slightly thicker or higher. This is partly due to the need to improve rainwater drainage to flat roofs, by slightly raising parapets, to allow a higher, minimum 150mm upstand in the inside to the flat roof, in accordance with good practice construction detailing. Insulation to roofs will also be thicker, due to the legitimate aspiration that the converted building achieves better insulation levels than the generally completely uninsulated existing. This is also why the new GRC panels will be slightly thicker than the existing concrete, to accommodate greater thickness of insulation to the walls to meet and where possible exceed modern building regulation standards. This increased thickness should have a barely noticeable effect on the dimensions, proportions and appearance of the concrete elements	

	to the rear elevations, which is considered to be a reasonable compromise with the desirable improved internal comfort and reduced energy requirements of the restored building. 7. Overall, the proposed external alterations will repair harmful previous alterations and failed external materials, enabling the restoration of the building to its original use and returning its external appearance to how appealing it originally looked, whilst accommodating better rainproofing, energy and comfort performance. **Internal Alterations** 8. Key spaces such as the triple height entrance foyer, with its striking curved stair and council chamber with its "floating" balcony and curved roof, are to be restored to close to their original function and appearance, with later insertions such as the platform lift in the foyer removed, replaced by better lifts just off the foyer. 9. Meeting rooms in the first floor west win are also to be restored, with the previously generally unsuccessful open space below, on "pilotti", to be lightly infilled with a new glass wall to its north and south sides well recessed from the existing 1st floor, set-out to the inside face of the existing columns. This should enable this simple glazed infill to have a very similar appearance to its original open appearance and allow the original idea of views of the landscaping to either side to be visible through the open plan, informal meeting space intended for this area. It should also make a really attractive space to greet visitors to the new Civic Centre, with a small café at its western end and with views and potentially spill-out onto the landscaped courtyards to either side. 10. The most significant changes to the internal layout will be to the four-storey north wing, housing offices. As existing and originally laid out, on the ground, 1st and 2nd floors there was a straight central corridor, with either individual offices or small group offices opening off. The 4th floor had a staff dining room, kitchen and smoking terrace. The general principle for the respiration is for modern, open plan office space for all. Some of the existing cellular offices have attractive timber panelled walls and doors, and these are to be retained as meeting rooms. The memory of the corridor will be retained in the columns, furniture, carpet and ceiling profile. 11. This office wing promises to provide a better quality, contemporary working environment, with greater equality for staff, the greater potential for efficient working ad fortuitous interactions, whilst the dual aspect will provide better	

	daylighting and cross ventilation, as part of the ambition for better environmental sustainability and comfort. **New-build element** 12. The main new build element will be a new four storey office "annex" to the north-west of the existing Civic Centre, occupying most of the existing surface car park, which does not present an attractive appearance, makes a detrimental contribution to the Conservation Area and the setting of the Listed Building, and promotes an environmentally unsustainable "car culture" at odds with both good urban design and the council's corporate priorities. A long, two-story link to the end of the west wing will be the main physical connection, as well as house meeting rooms and ancillary space, whilst a short, narrow 1st floor bridge will connect to the northern end of the existing north wing, where the annex will be closest to the existing, enclosing a central courtyard. 13. The new annex and its links will be rectilinear in plan, following the geometry of the existing civic centre rather than following the slightly different angles of the site boundaries. This deliberate choice is made relate more to the existing Civic Centre than to the surrounding residential streets, but also is based on an urban structure observation that the block within the Civic Centre site, alongside just a few other buildings, of predominantly public function, including St Michaels Parish Church to the south and Trinity Academy Primary School to the west of the Civic Centre, sit as "objects in space", with landscape flowing around them, rather than as "street-based" buildings that fill or nearly their plot frontage and create a clear "front" and "back". 14. This analysis goes further, with the observation that not only is block containing the site and these other objects-in-space buildings sandwiched between two public parks; Crescent Gardens to the east and Trinity Gardens to the west, giving a significant parkland element to their context. What is more, the history of development of this and neighbouring blocks, is that these objects-in-space buildings, including the almshouses that preceded the Civic Centre, and those parks, and the main roadways of Wood Green High Road, Bounds Green and White Hart Lane, immediately here, developed out of former common land, further vestiges of which can be found in the green spaces south-west of the High Road - Bounds Green Road junction, further up Bounds Green Road, where Trinity Gardens narrows to a slither, and where Crescent Gardens narrows to a point on	

	White Hart Lane. Therefore, the roughly triangular former common land, bounded by Trinity Road and the north side of White Hart Lane to the north, Crescent Road, east of Crescent Gardens to the east-south-east and the properties south of Bounds Green Road to the south-west, was surrounded by private fields and is now surrounded by private residential and commercial development, as generally continually built-up, street-facing, built form, but now contains public space and public buildings that generally read as objects in landscape, and which this new build element of the annex seeks to continue. As an added advantage, this should help the extensive and ambitious plans for landscaping all around this proposed Civic Centre development integrate into the landscaped setting. 15. The architecture of the new build elements promises to be simple, elegant and well proportioned. Although the height, rising to a maximum of four storeys, the fourth floor being only plant, is modest and matches the number of floors in the existing Civic and neighbouring school, but floor to floor heights and therefore its overall height are slightly higher than the Civic. The top floor of plant has therefore been carefully designed to be recessive, set back, and designed not to attract attention. The amount of plant required is necessary to provide comfortable working conditions whilst being the most sustainable office building possible; much of the land could not be in a basement anyway, but a basement is also avoided for sustainability reasons. Views of the proposals in the conservation area setting convincingly demonstrate that it will be a recessive background building compared to the more prominent public buildings, including the original Civic. 16. Although in concept the new office annex will be an “object-in-space”, each of its facades are differently composed within the common overall language of elevational composition of repeated, vertically proportioned windows between glass reinforced concrete (GRC) panels set in a grid of projecting GRC vertical and horizontal fins, with one large window / curtain-walled panel to the right side of each façade to mark special corners and internally to locate office “breakout” spaces. The differences in elevations respond to both aspect, and its climate response, and to context; fins provide sun shading, with vertical fins more prominent and positioned so as to shade east and west facing windows and relate more to the architecture of the existing Civic Centre, more prominent horizontal fins shading the southern façade, addressing the landscape, and a more flat,	

	calmer, more domestic façade facing, and emulating the proportions of fenestration in the residential Trinity Road to the north. 17. Materials and details, including windows and the GRC, design of ribs, windows, parapet coping, and how it meets the ground, should be subject to conditions requiring material samples and large scale details to ensure durability and weather proofing to avoid unsightly staining and ensure attractive appearance. Overall, the proposed office annex promises to be an elegant contemporary building of a calm, background nature that respects its context. **Impact on Neighbours, including daylight, sunlight and privacy** 18. To the north, the new office annex will face existing predominantly two storey residential terraced houses on Trinity Road. As noted above, the new block does not follow the line of Trinity Road, but only gradually diverges from it. The proposal is fairly well set back from the street edge, in particular to avoid any interference with the existing large mature trees along the application property's boundary to Trinity Road. These trees and this set back should avoid any disturbance from privacy or light pollution to those houses to the north, for which this is also their street frontage, where there is less expectation of privacy and lack of disturbance than to a back garden side. 19. Given the distance and relatively modest height, detrimental loss of daylight and sunlight was always unlikely, nevertheless the applicants have prepared a day and sunlight assessment in accordance with the Building Research Establishment's publication "Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice" (3rd Edition, Littlefair, 2022), known as "The BRE Guide". This demonstrates only minor loss of daylight that would be barely noticeable and no loss of sunlight, which is additionally exceptional given that these houses' existing condition has been an open car park, rather than a more normal for London built context. 20. To the south-west, a corner of the new office annex and the back of the western link will back onto a permanent mobile homes site, as the western end of the west wing does now. To both new build elements, this will be largely blank façade or only with high-level clerestory lights, to avoid overlooking, whilst maintaining the architectural language of raised ribs and recessed panels in GRC. Coincidentally this avoids the greatest overheating threat location being used for offices, and will	

	instead house ancillary accommodation such as meeting rooms, toilets, storage and plant. **Landscape and Public Realm** 21. With both the existing and new Civic Centre buildings acting as "objects-in-space", landscaping is designed to flow around the building. Nevertheless, a series of distinct landscaped areas can be identified and have been carefully designed to respond to their different contexts, and functions. Therefore, there is landscaping to the frontage, facing Wood Green High Road, to the north-eastern corner, along Trinity Road, to the north-western corner / back of Trinity Primary and the larger landscaped area to the south-western corner, as well as the new central courtyard. 22. The main frontage faces the High Road and Crescent Gardens cross it; this was and will once more be the main public entrance and "public face" of the Council HQ. Previously it was somewhat car-dominated, with a vehicle lop in front of the entrance and extensive parking; some parking will be retained , for disabled visitors, but with less prominence amongst more landscaping and a more pedestrian friendly landscape. Previously four steps led up from this roadway to the entrance door, with a later ramp awkwardly squeezed into its south to provide disabled access, albeit not to modern standards. This will be replaced by a level/very gently sloped approach from the public pavement, providing much better, equal and more inclusive access; very occasional vehicles will ramp up onto this, controlled by movable bollards, with routine access to the parking becoming in and out form the north and south. Whilst being something of a barrier to access for some, the previous steps have historically formed something of an informal "dais" for public announcements, demonstrations and reportage, the most commonly pictured location whenever Haringey Council was in the news; the more level landscape will create a more inclusive, less confrontational, but somewhat less dramatic stage for these occasions. 23. At the north-west corner, at the junction of Trinity Road with the High Road and facing the junction of White Hart Lane, there will be a more complex landscape, containing the retained historic entrance to a former nuclear bunker, forming a raised, landscaped, brick plinth, with a secondary building entrance, for staff only, via a gate under the proposed link bridge, somewhat tucked behind. The opportunity of the plinth has been taken to provide some covered cycle parking	

	in a lockable structure with a landscaped roof; the doors and sides to this and these gates open a language of robust, secure but decorative metalwork, to be continued elsewhere. Carefully designed and integrated proposed external lighting and CCTV, as well as plentiful passive surveillance from within the office annex, should mitigate security concerns at this somewhat secluded entrance. 24. Along Trinity Road, the proposed office annex does not provide a conventional street face, of front gardens, activated by entrance doors, but will have plentiful passive surveillance form many windows. The landscaping will be between the large existing mature trees, the new building to its south and the quietly trafficked but busy pedestrian street of Trinity Road, which is not a through route for vehicles but is a formally designated School Street, a main approach to Trinity Primary and a generally popular east-west pedestrian route. The proposed landscaping of shade tolerant plants and hard landscape features is intended to act as a "play-on-the-way" landscape, eminently appropriate to its location, constraints and likely use, that should help integrate the new Civic Centre landscape into widder existing community use. 25. Landscaping of the north-western corner is one of the more tricky conundrums; whilst maintaining the open landscaped concept, this has to act as a servicing and deliveries "yard", the main location for staff cycle parking and relate to the back walls to private rear boundaries to the school and mobile homes site. These significant security constraints would suggest a more enclosed, secured design would be more appropriate, but the design of the cycle parking as an enclosed, covered structure in the same language and materials as that in the north-east corner secures the southern half of this area as a secluded wooded glade, whilst CCTV, lighting and a raisable barrier will be relied on to secure the delivery area whilst maintaining the appearance of open, flowing landscaping. 26. The larger landscaped area to the south / south-west of the Civic Centre, with a short frontage onto Bounds Green Road, longer side walls to the mobile homes site to the west and the rear of the church and its neighbouring office building to the east, and the restored existing Civic containing no public entrances to this side, make its public activation, purpose and passive surveillance tricky, compounded by the need to retain and enlarge various plant and sub-station structures along the church and neighbouring office boundary and service vehicle and parking requirement through that eastern edge. It is considered by the applicant team that public access through this area, as a short cut between	

	Bounds Green Road and the High Road, and to provide an additional public garden space (close to the existing Trinity and Crescent Gardens). Its northern edge will be highly visible from within the new meet and greet area under the west wing, and could provide a sunny break-out space / café terrace if security considerations allowed, but that is not currently possible, and the meeting rooms to the 1st floor west wing ground floor under the council chamber provide less animation or passive surveillance. Design Officers will maintain a watching brief as to whether this combination of functions and public access remains appropriate, rather than a more private, secured space or use. 27. Finally, the central courtyard garden promises to provide a landscaped jewel at the heart of this new Civic Centre. Access from buildings to all sides, as well as the staff entrance gate in the north-eastern corner, overlooked by primary circulation routes and break-out spaces within the building, and landscaped with raised seating amongst planted beds, this should be a most attractive space for outdoor meeting, lunch, casual interaction, contemplation and a breath of fresh air (but not for smoking), adding to office wellbeing and immensely aiding wayfinding and orientation within this large proposed building complex. 28. A number of well chosen, durable and attractive landscaping materials and components, including furniture, hard landscaping materials and planting have been proposed, but should be subject to conditions. In particular, great care will be required to integrate external lighting and CCTV, to avoid unsightly clutter whilst maintaining vital functionality. Considerable progress has been made on this already in their detailed design proposals, but conditions should nevertheless still be required. Nevertheless, much of the landscaping demonstrates the overall exemplary nature of this project, to revive, restore and complete a handsome Civic Centre from the optimistic, open era of the architecture of democracy. **Conclusions** This promises to be an exemplary project, in an appropriate location for public facilities in a publicly accessible, useful and attractive landscape, to revive, restore and complete a handsome Civic Centre from the optimistic, open era of the architecture of democracy, respecting its heritage status, whilst providing a comfortable, efficient, effective, sustainable, inclusive and open, public facing council headquarters.	

Planning Policy	**Key designations** • Wood Green Growth Area • Trinity Gardens Conservation Area • Civic Centre Site Allocation (SA5) • Grade 2 Listed Building **Principle and Quantum of development** The Civic Centre is an allocated site (SA5) in the adopted Site Allocation Local Plan document, and is allocated for both residential, employment and town centre uses. It is also a draft allocation for the same uses within the draft Wood Green AAP (Reg 18, 2017). Both these allocations allow for the wholesale redevelopment of the site subject to reprovision of the Civic functions or significant refurbishment of the Civic Centre and conversion to residential. Since these documents have been published the site has been listed by Historic England and is now a Grade 2 listed building. This listing significantly affects the relevance of the adopted and draft site allocations, as it now effectively precludes full redevelopment of the site. It also constrains the potential to convert the building to uses other than civic / offices. Therefore the weight of the allocations guidance on redevelopment and capacities is limited, but the principles regarding appropriate uses and other site requirements remain relevant, alongside other Local Plan policies. In this case, the principle of using the car parking area of the site for new office accommodation, refurbishing the buildings for civic and office use, whilst giving significant regard to the listed building generally accords with the objectives for the site allocation, taking into account the significant constraints on the scale of redevelopment now possible. Whilst the proposal does not include residential uses, in the context of the provision of a significant quantum of office and civic floorspace, the difficulty of converting to other uses, and the continued use of the Civic Centre for its intended purposes, the loss of the potential residential capacity is acceptable.	Comments noted
Pollution	Having considered all the relevant supportive information on pollution especially the Design ad Access Statement, Energy Statement with the proposed Air & Water Source Heat Pumps as the source of energy and the Air Quality Assessment report with reference 0044501 – BHE – XX – XX – RP – AQ – 01 Rev P02 prepared by Buro Happold	Suitable conditions and Informative will be applied

	Ltd dated 14th March, 2023 taken note of sections 4 (Methodology), 5 (Baseline Conditions), 6 (Construction Impacts), 7 (Operational Impacts), 9 (Mitigations) and 9 (Conclusions), please be advise that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted. 1. <u>Land Contamination</u> Before development commences other than for investigative work: a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority. c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements. d. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. e. 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.	

	Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety. 2. Unexpected Contamination If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved. Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework. 3. NRMM **a.** 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 IIIB 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 http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site. **b.** 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. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ	

	4. <u>Demolition / Construction Environmental Management Plans</u> **a.** Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst **b.** Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The following applies to both Parts a and b above: a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP). b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include: i. A construction method statement which identifies the stages and details how works will be undertaken; ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays; iii. Details of plant and machinery to be used during demolition/construction works; iv. Details of an Unexploded Ordnance Survey; v. Details of the waste management strategy; vi. Details of community engagement arrangements; vii. Details of any acoustic hoarding; viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance); ix. Details of external lighting; and, x. Details of any other standard environmental management and control measures to be implemented. c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on: i. Monitoring and joint working arrangements, where appropriate; ii. Site access and car parking arrangements;	

	iii. Delivery booking systems; iv. Agreed routes to/from the Plot; v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching. d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include: i. Mitigation measures to manage and minimise demolition/construction dust emissions during works; ii. Details confirming the Plot has been registered at http://nrmm.london; iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection; iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection); v. A Dust Risk Assessment for the works; and vi. Lorry Parking, in joint arrangement where appropriate. The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out whilst, some of the already submitted information can be consider for the discharge of part of the above condition 4. Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality." Informative: 1. Prior to demolition or any construction work of the 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 accordance with the correct procedure prior to any demolition or construction works carried out.	
Refuse Management	**Comments received 23/05/2023:** The WMS is very thorough and references national, regional and local guidance and outlines that the waste and recycling storage arrangements will be supported by the facilities management team. The recycling streams we would expect to see have been accommodated as well as other smaller categories of waste such as small electricals and confidential waste. The WMS (para 4.5) mentions that collections will be 3 times a week but it is not clear if this is in total or 3 times for waste and 3 times for recycling per week. We would usually advise that storage is sufficient to hold a week's worth of waste / recycling unless there are exceptional circumstances. Also for note is that we can only collect organic waste from 140 litre wheelie bins. We will be updating the Haringey supplementary planning guidance to reflect this. The assumptions around the generation of waste and recycling from an office seem reasonable give that Haringey doesn't have specific guidance on this. Westminster apply the following approach below and in the attached which may be helpful as a cross reference, if not already used. **3.1.2 Offices, professional services and community uses (A2, B1 and D1)** - 2000 litres waste storage for every 1,000 m2 gross floor space. Note: 70% of this capacity must be retained for the storage of separated material (50% paper and cardboard, 10% other dry mixed recyclables, 10% food waste). **Comments received 30/06/2023:** I agree with what's proposed and the flexibility with the collections if required.	Allowance for smaller than usual refuse stores and an exemption to single weekly collection to allow three weekly collections has been approved by the refuse management team. A condition requiring detailed design of the stores is recommended.

Sustainable Drainage (SuDS)	Having reviewed the applicant's submitted documents outlined below: 1) Flood Risk Assessment document reference number HCC-BHE-XX-XX-RP-C-000002, 0044501, Revision P01, dated 14 March 2023 2) Drainage Strategy document reference number HCC-BHE-XX0XX-RP-C-000001, 0044501 Revision 02 dated 15 March 2023 Prepared by Buro Happold Consultant, we are content with the submission and we have no further comments to make on the above planning application. If the scheme is to build as per the above submitted documents, the impact of surface water drainage will be addressed.	These are noted and included in condition regarding SuDS compliance.
Sustainability	Discussions are on going and final comments will be provided via addendum, the following actions have been identified. ## Carbon Management Response 18/08/2023 <u>Energy Strategy Actions:</u> - The applicant should report their baseline CO_2 emissions and savings in tCO_2/year, not $kgCO_2/m^2$. It should also include clear tables, as set out by the GLA, for the site-wide carbon reductions, and the reductions for the new build and refurbishment parts of the development separately. It is not enough to include the GLA carbon emission reporting spreadsheet, it should also be in the main report and the spreadsheet does not clearly differentiate between the new build/refurb. - Clarify whether the GLA carbon emission reporting spreadsheet is only for the new build element. It appears that it does not include the results for the refurbished building, which reports a reduction of 80%. <u>Energy Use Intensity / Space Heating Demand Actions:</u> - Clarify the energy use Intensity against the GLA benchmark of 55 kWh/m2/year. <u>Baseline Actions:</u> - To be clarified	Conditions and obligations included.

	<u>Be Lean Actions:</u> - The g-value on p.13 of the ES is different from the g-value on the GLA reporting spreadsheet. Please clarify - Please clarify; two different efficiencies are reported for the ventilation with heat recovery, 80% and 90%. - Please clarify; the SCOPs for the heat pumps have been reported as different figures too. - Set out how the scheme's thermal bridging will be reduced. - Clarify how many air changes per hour the natural ventilation could achieve. - Clarify why the façade external lighting been excluded from calculations? - Clarify if the development include waste water heat recovery? <u>Retrofit Actions:</u> - Prepare a best-case retrofit scenario (including overheating) "with all the measures that would be Thermal bridging impacts needs to be assessed as part of this." - Submit s evidence that the retrofit strategy has been responsibly informed by building surveys to inform the existing performance, and moisture movements, as well as thermal bridging modelling that has informed the insulation strategy. Please also demonstrate that this is the most cost and space efficient option. - Demonstrate how the internal insulation option will not negatively impact on the existing fabric (in its construction and operation due to moisture buildups) and that suitable monitoring for these risks are in place. - The case studies provided to illustrate precedent have not been backed up with any information to demonstrate this kind of strategy has been implemented successfully in a similar construction. <u>Be Clean Actions</u>: – Demonstrate the spatial arrangements are suitable for a future DEN connection. Please submit a site plan showing the connection point at the edge of the site, location of a pipe between the connection point and plant room, and plant room layout and schematics. <u>Be Green Actions:</u>	

	- Clarify if the carbon reduction for the solar PV has been completely allocated to the new build or existing building in the Part L calculations? - Clarify why is lighting demand being reduced under Be Green? - Clarify how the remaining domestic hot water usage will be met (apart from the handwash basins), is this through the WSHP? - Clarify where will the 900l hot water be stored? - Clarify if any waste heat from the equipment rooms or other areas being recovered into the space heating system? <u>Be Seen Actions</u> - Clarify what arethe unregulated emissions and proposed demand-side response to reducing energy: smart grids, smart meters, battery storage? - Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform) <u>Overheating Actions:</u> - Confirm this model uses the CIBSE TM49 files for the Central London Weather file. - Confirm that the model used to inform the results incorporate the latest design – the report says the plans used are from January 2023. - Set out the weather file used / internal gains and occupancy profiles / thermal mass assumption / thermal elements performance (u-values, g-value) / heat losses from pipework and any relevant heat interface units for the heating systems. - Demonstrate the Cooling Hierarchy has been followed, currently this has not been demonstrated and therefore this development is not compliant with Policy SI4. - The applicant must demonstrate that the risk of overheating has been reduced as far as practical and that all passive measures have been explored, including reduced glazing and increased external shading. The applicant	

	should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans. - Specify the shading strategy, including: technical specification and images of the proposed shading feature (e.g. overhangs, Brise Soleil, external shutters), elevations and sections showing where these measures are proposed. Internal blinds cannot be used to pass the weather files, but can form part of the delivered strategy to reduce overheating risk for occupants (as long as it does not compromise any ventilation requirements). - Specify the ventilation strategy, including: floorplans showing the ventilation strategy per zone (predominantly natural, predominantly mechanical, stack ventilation, mechanical only) and specify the efficiency and air changes, window opening areas for the relevant openable windows as shown on elevation(s). - Confirm that any potential noise or air pollution sources from the road or adjacent school can be temporarily mitigated through the overheating strategy. - Include images indicating which zones were modelled and floorplans showing the modelled internal layout of the zones. - Undertake further modelling: o Model the 2020s DSY 2 and 3 and DSY1 for the 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan. o Any potential further modelling depending on which zones have been modelled. - Specify the active cooling demand, only after having followed the cooling hierarchy (space cooling, not energy used) on an area-weighted average in MJ/m^2 and MY/year. Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point, and whether it has been powered by any renewable sources. Part of the Energy Strategy appears to indicate that the cooling demand is actually higher than the notional building. - Set out a retrofit plan for future and more extreme weather files, demonstrating how these measures can be installed, how they would reduce	

	the overheating risk, what their lifecycle replacement will be, and who will be responsible for overheating risk. - Demonstrate how these future mitigation measures will improve the overheating results. - Confirm who will own the overheating risk when the building is occupied. <u>Climate Adaptation Action:</u> - Identify in what ways the development will increase the resilience of residents and businesses and adapt their public realm to the impacts of climate change. <u>Whole Life-Cycle Carbon Actions</u> - Submit WLC report **Conditions and Heads of Terms** **Conditions** - Energy strategy - Retrofit strategy - Future DEN connection - Overheating - BREEAM Certificate for 'Outstanding' - Living roofs - Whole-Life Carbon calculations - Circular Economy strategy - Biodiversity - **Heads of Terms** - Be Seen commitment to uploading energy data - Energy Plan - Sustainability Review - Estimated carbon offset contribution (and associated obligations) of £XXXX (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.	

	- Future DEN connection (and associated obligations) **Carbon Management Response 01/09/2023** <u>Actions:</u> - Confirm the baseline used for the refurbished building? - Confirm the baseline for new build has changed from 24.8 to 22.3? - Clarify why Be Clean savings are in the refurbished building? - Clarify why the overall carbon savings have reduced from 80% to 41% in the refurbished building? - Clarify what the BRUKL stage 3+ is? - Confirm that the calculations have been done in line with the certified methodology under Building Regulations? - Clarify why is waste heat from the equipment stores not being recovered in line with Policy SI3. - Demonstrate that the EUI is justified by the additional use in this building with a comparative occupancy profile between a 'usual' office building and the one proposed, and what uses are proposed after hours. **Conditions and Heads of Terms** **Conditions** Revised Energy strategy Retrofit Strategy Sustainability Review Be Seen Energy Monitoring Future DEN connection Revised Overheating Strategy BREEAM Certificate for 'Outstanding' Sustainability Targets Living roofs and roof albedo Whole-Life carbon calculations Circular Economy Strategy Climate change adaptation and resilience	

	Heads of Terms Carbon offset contribution (and associated obligations) of **£98,325** (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan prior to implementation (with a 50% payment of the contribution) and at the Sustainability Review stage prior to occupation (with a payment for the outstanding amount).	
Transport	**Description** An application has been received seeking planning permission to redevelop the existing car park and erect a three-storey building Class E Office. The development would see provision made for 8 on-site car parking spaces, with 3 allocated as accessible spaces, 136 long-stay and 34 short-stay on-site cycle parking spaces would be provided, with further provision made for staff showers and lockers. The 3 on-site car parking spaces would be supported with electric vehicle charging points from the onset, with future capabilities for other spaces. The development will have a gross internal floorspace of 10,547 sqm; there are currently 4 vehicular accesses onto and off the location site. The development will have an average of 800 office workers on site during the core hours of 08:00 –18:00, with a maximum of 1,030 persons occupying the new development at any one time. The site is located within the Wood Green CPZ, which restricts parking to permit holders only Monday to Saturday, 0800-1830. Trinity Road does contain some pay and display bays with a max stay of 2 hours. Furthermore, a School Streets is located on Trinity Road, which operates Monday to Friday 08:15-09:15 and 14:45-15:45. The site fronts on High Road A105, which is an adopted council road. The proposal site has a PTAL rating of 6b, indicating that its access to public transport is excellent when compared to London as a whole, suggesting that there are opportunities for some trips to be made to and from the site by modes of transport other than the private car. The site is easily reachable from Wood Green Station, which is only a 4min walk, and 3min bike ride. Furthermore, Alexandra Palace Station is only a 12min walk and 5min bike ride from the site. The location is well-serviced by buses on High Road, with these being 121, 141, 232, 329, 629, and W4. Bus stops are located at in front and opposite the Civic Centre on High Road.	Conditions noted. This is a Council owned application so there is no requirement for a S106 but the obligations will be included as conditions.

	Trip Generation Trip generation has been constructed using both census data from 2011 and TRICS sites, the developer has tried to utilise comparable sites. Although, the Highway Authority finds these sites to have significant differences in terms of their location compared to the development site, which limits comparability, it is to be noted that the trips generated by the new offices are not all new trips as the staff will be relocated from other council offices in the surrounding area to the new building. The new development will host council meetings during weekday evenings from 18:00 – 22:00 and weekends from 09:00 – 20:00, this will be similar to the previous use of the Civic Centre, no new additional functions are proposed which is likely to generate additional trips when compared to the previous use as a Civic Centre/ office compared to the new proposal, and as the majority of the current staff are already located within the local area we have considered that the additional trips that will be generated by the development proposal will be negligible and are likely to be by sustainable modes of transport. It is acknowledged by the Highway Authority that with the reduction in on-site car parking, the new development will produce considerably less vehicle trips. The census data was utilised to produce mode share trips for the existing development. As previously discussed, staff will be moving from other council offices to the location site, which is understood to be new trips to the development site. Overall, trip generation is considered to be acceptable. **Car parking** Planning Policy requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.2 Office Parking requires that development proposals must comply with the relevant parking standards, which equates to 1 space per 100 sqm GIA. For a development of this type, a Class E Office with a PTAL with a ranking of 6b, the maximum number of car parking spaces permitted would be 105no. spaces. Therefore, the 8 proposed are in accordance with this policy. Additionally, lower car provision for office developments is further supported by the London Plan 2021, where the site is accessible via public transport, walking and cycling.	

	The London Plan 2021 T6.5 non-residential disabled persons parking states that disabled person parking should be provided in accordance with the levels set out within the policy. With at least access being provided to 1 on or off-street disabled persons parking bay. As a minimum 5% of the on-site car parking spaces must be designated disabled persons parking bay from the outset, which would be 1 parking space. All designated bays should be marked up as disabled person's parking bays from the outset. If it can be demonstrated that the existing level of disabled persons parking is not adequate. The process for converting enlarged bays should be set out in a Parking Design and Management Plan which must be secured by way of a planning condition. All designated disabled person's parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS8300: Vol 1. Therefore, the Highway Authority finds the provision of the 3 to comply with this policy. Although, it is understood that priority 1 (Blue Badge or mobility issues) permit holders will be accommodated either on-site or on-street locally to the development. The Highway Authority believes that a higher provision of disabled bays should be made available from the onset, as it has been stated that there are currently 5 blue badge holders at Alexandra House who will have to move to the new site. Thus, having 5 provided from the onset will grant them the ability to park at the new site without fear of traversing any great distance. Information has been supplied within the Transport Assessment on the current occupancy of the location sites car parks. All council staff parking permits are issued via a priority system ranked highest P1 (Blue Badge or Mobility issues) to lowest P9 (Casual). There are currently 134 permits issued to staff. The new development would see this number reduced from 134 to 46, with the reduce number of permits allocated to high-priority level users only. A parking stress survey was conducted, which utilised the Lambeth Methodology of 500m from the site, which covered a maximum 7min walk radius. It revealed that there are 317 available on-street parking spaces for those working at the site to use, though this would only be limited to the 46 permit holders, which has been mentioned already, and these permit holders, in the first instance, will be accommodated in other council-	

	owned car parks. The Highway Authority would require a Car Parking Management plan to be submitted which would provide further details on the site's car parking. This must be secured by way of a planning condition. **Cycle parking** The development will see provision for on-site cycle parking being provided within the published London Plan 2021 Policy T5 Cycle standards, which are as follows Class B1 Business Office Long-stay 1 space per 75 sqm, short-stay 1 space per 500 sqm, with 1 extra after first 5000 sqm. Class D1 Other long-stay 1 space per 8 fulltime staff and short-stay 1 space per 3 fulltime staff. The applicant is proposing to provide a total of 136 long-stay and 34 Short stay cycle parking spaces. No long-stay cycle parking is proposed for the class D1 us as it is proposed by the applicant that this is accounted for within the office function of the building and is not required for the civic use. The Highway Authority would request that a higher provision of cycle parking is provided on-site as previously mentioned the development could see up to 800 staff working on-site. Policy T5 Cycle, which requires that developments *'provide the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located and be in accordance with the minimum standards.* We will therefore require the cycle parking provision to be monitored as part of the staff travel plan which must be secured by condition, as part of the detailed design efforts should be made to increase the level of on-site cycle parking provision. The Transport Assessment mentions that the cycle parking provision will be designed and built according to Transport for London's London Cycle Design Standards (LCDS). The Highway Authority would require that plans are submitted showing in depth design and type of long and short stay cycle parking, this must be secured by condition. **Pedestrian / vehicular access to site Access** The submitted Transport Assessment has included an Active Travel Zone (ATZ) assessment which covers a 20-minute cycle area from the site. An examination of the walking and cycling environment to the site via five routes and 5 clusters for collision data has been provided as part of the assessment. Cluster 1 (A105 High Road – White	

	Hart Lane junction) and cluster 2 (A105 High Road – A109 Bounds Green Road junction) are near the site location, with both clusters containing several serious and slight collisions. Although, it is unknown how many of these are made up of pedestrians and cyclists. Some recommendations have been stated within the ATZ detailing improved upgraded signalled crossings and facilities for pedestrians, tactile paving on existing crossings, dedicated cycle infrastructure on White Heart Lane, and improved East-West pedestrian crossing facilities on High Road-White Heart Lane. With the reduction in on-site parking from the new development, it will mean employees are more likely to walk and cycle to the site, consequently increasing trips made by these modes. Therefore, the Highway Authority would require the developer to provide funding towards a highway improvement scheme which will address issues surrounding pedestrian and cyclist road safety within the vicinity of the site. The site will be using the existing vehicle entrances, with barriers installed to prevent unauthorised access from vehicles. However, information has been submitted on proposed barriers, with the one on Trinity Road being brought closer to the highway which would block the pedestrian footpath whilst vehicles are waiting to enter the site, which could result in pedestrians walking around the vehicle into the highway thus increasing road danger. This would not be in accordance with the published London Plan 2021 Policy T4 Assessing and mitigating transport impacts which states that *'development proposals should not increase road danger'*. Therefore, the Highway Authority would require that any existing barriers are kept at their present location, this must be secured by way of a planning condition. **Electric vehicle charging** As mentioned above the development would see provision of electric vehicle charging points being made available for 3 on-site parking spaces only. Although, it is not understood whether these will have active capabilities. A future provision option has been mentioned, which would see the remaining spaces provided with similar capabilities to the first 3 The published London Plan Policy T6.2 Office Parking which states that '*Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other Ultra Low Emission vehicles, including active charging points for all taxi spaces'.* Therefore, the Highway Authority would request that full provision of active charging points is provided from onset for all spaces to maximise electric travel to the site, especially	

	when considering cease of sale of new combustion engines by 2030, this must be secured by way of a planning condition. **Service and Delivery** Servicing of the site will take place at two locations. The main servicing and refuse collection will be accessible from Trinity Road, and a secondary servicing and refuse collection will be located off Bounds Green Road. Swept path drawings have been submitted to demonstrate how vehicles will exit in first gear. Vehicles using the main servicing location will turn on-plot, and those using the secondary will enter via High Road and exit onto Bounds Green. Therefore, the Highway Authority finds the swept path drawings to be satisfactory. However, the developer will still need to submit a Service and Delivery Plan, which will provide more depth of detail. **Construction Logistics Plan** No Construction Logistics Plan have been submitted as part of the submission, although some information has been provided within the Transport Assessment document regarding the development's construction. Overall, construction is expected to last 20-22 months, with a start date given of January 2023. A worst-case scenario has been presented in which 75% of traffic will use Trinity Road, and 25% would be diverted by High Road A105. Core working hours have been given as the following Monday to Friday 08:00 – 18:00, Saturday 08:00 – 13:00, and no working on Sundays, Bank or Public Holidays. However, the Highway Authority finds the operating times to be unacceptable as they should be outside of peak AM and PM to minimise the impact to local residents and the highway/road network on Trinity Road, Bounds Green, and High Road A105. The Highway Authority would require that a Construction Logistics Plan (CLP) be submitted by the developer/applicant. This can be secured via a planning condition. The developer/applicant will need to adhere to Transport for London's guidance when compiling the documents, construction activity should also be planned to avoid the critical school drop off and collection periods, the applicant will be required to pay a construction travel plan contribution of five thousand pounds (£5,000) for the monitoring of the construction activities on site. **Recommendation**	

	There are no highway objections to this proposal subject to the following conditions and s.106 obligations. **Conditions** 1. Cycle Parking The applicant will be required to submit to the Highway Authority plans showing accessible; sheltered and secure cycle parking for 136no. long-stay and 34no. short-stay for approval. The applicant will be required to submit plans to the Highway Authority in detail showing the design and type of on-site cycle parking for both short and long stay. Reason: To ensure that cycle parking is provided in line with the London Plan 2021 Policy T5 and the London Cycle Design Standard (LCDS). 2. Delivery and Servicing Plan The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The DSP must be in place prior to occupation of the development. The delivery and servicing plan must also include a waste management plan which includes details of how refuse is to be collected from the site. Reason: To ensure that the development proposal can be serviced adequately. 3. Car Parking The applicant will be required to submit a Car Parking Management Plan to the Highway Authority for approval which details the management of onsite car parking and the allocation of the reduced quantum of essential car parking permits. Reason: to ensure that the impact of the reduction in the onsite car parking does not negatively impact on the on-streetcar parking provision on the local area surrounding the site. 4. Electric Vehicle Charging Subject to a condition requiring the provision of 8no. active electric vehicle charging points to serve the on-site parking spaces from onset. Reason: to be in accordance with published London Plan 2021 Policy T6.2 Office Parking. 5. Disabled Parking Bays	

	The applicant will be required to submit and provide plans showing 3no. on-site disabled persons parking bays. Reason: to ensure the development is in accordance with the published London Plan 2021 T6.5 non-residential disabled. **S.106 Obligations** <u>1. Construction Logistics and Management Plan</u> The applicant / developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £5,000 (five thousand pounds) to cover officer time required to administer and oversee the temporary arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved: a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required; and d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the Wood Green area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety. <u>2. Highway Improvements</u> The applicant shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access	

	and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. In addition, the cost estimate is based on current highways rates of the permanent highways scheme. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of this cost estimate. The cost of the S.278 works have been estimated at £366,000 (three hundred and sixty-six thousand pounds) and must be indexed linked and reviewed annually or before the implementation of each phase of the highway works. Reason: To implement the proposed highways works to facilitate future access to the development site. <u>3. Workplace Travel Plan</u> The Applicant will be required to enter a Section 106 agreement to secure a Workplace Travel Plan. As part of the travel plan, the following measures must be included in order to maximise the use of public transport: a) The applicant submits a Works place Travel Plan for the commercial aspect of the Development and appoints a travel plan coordinator who must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually for a period of 5 years and must include the following measures: a) Provision of welcome workplace induction packs containing public transport and cycling/walking information, available bus/rail/tube services, map and timetables to all new residents, travel pack to be approved by the Councils transportation planning team. c) The applicant will be required to provide, showers lockers and changing room facility for the workplace element of the development. d) The developer is required to pay a sum of £2,000 (two thousand pounds) per year per travel plan for monitoring of the travel plan for a period of 5 years. This must be secured by S.106 agreement. Reason: To promote travel by sustainable modes of transport in line with the London Plan and the Council's Local Plan SP7 and the Development Management DMPD Policy DM 32.	

External	Comment	Response
Metropolitan Police (Designing Out Crime)	Section 1 - Introduction: With reference to the above application we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer. It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1). We met with the original project Architects, Local Authority and the security consultants in Feb 2022 to discuss Crime Prevention and Secured by Design pre-application stage and discussed our concerns around the design and layout of the development. There is also mention of security in the DAS (Section 7.1.3) and the security statement has been reviewed. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early stage. At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences. Whilst in principle we have no objections to the site, in light of the complexity and sensitivity of the site we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the Architects ensure the ongoing dialogue with our department continues throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity. The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to. Section 2 – Secured by Design Conditions and Informative:	Noted and conditions attached.

	In light of the information provided, we request the following Conditions and Informative: Conditions: A. Prior to the commencement of above ground works of each new building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guide lines at the time of above grade works of each building or phase of said development. The development shall only be carried out in accordance with the approved details. B. Prior to the first occupation of each building, or part of a building or its use, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained. Reason: In the interest of creating safer, sustainable communities.	
Thames Water	**Waste Comments** The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. 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 significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide â€˜working near our assets to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scaledevelopments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water.	Comments noted and condition / informative included

	Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We need to check that your development doesnâ€™t limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scaledevelopments/planning-your-development/working-near-our-pipes Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes We would expect the developer to demonstrate what measures will be undertaken 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 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholsesale; Business customers; Groundwater discharges section. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. Water Comments The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agencys approach to groundwater protection (available at: https://www.gov.uk/government/publications/groundwater-protection-positionstatements) and may wish to discuss the implication for their development with a suitably qualified environmental consultant. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. 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.	
Twentieth Century Society	**Initial Comments 21 June 2023:** The Twentieth Century Society has been notified of the Listed Building Consent application for the "Redevelopment of the existing rear car park for the erection of a three storey building (plus roof enclosure) comprising of Class E floorspace; 2 x two storey links; creation of central courtyard; parking and landscaping; and refurbishment and external alterations of the existing Civic Centre and offices, including alterations to entrance facade and fenestration; and associated works". Haringey Civic Centre was built in 1955-58 to designs by Sir John Brown, A E Henson and Partners and was the first civic centre of its size to be completed following World War II. It was Grade II listed in 2018 and is located within the Trinity Gardens Conservation Area (which was designated in 1978 and extended in 1988). Policy Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority […] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." The National Planning Policy Framework (NPPF, 2021) includes paragraph 194 which states that "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance". Paragraph 199 states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation […] This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Paragraph 200 states that "Any harm to, or loss of, the significance of a designated heritage asset […] should require clear and convincing justification." Comments The Society has been concerned about the future of the civic centre for many years and has followed this case closely. We very much welcome the council's decision to relocate	Additional surveys from PAYE and ASWS were provided subsequent to initial comments. Following review and a site visit the second set of comments were received.

	its staff back to the civic centre, allowing the building to continue to perform its original intended function. We have no objections to the proposed 'Trinity Building' extension. We appreciate that its location and points of connection have been informed by original plans for a larger civic development. The Society is concerned about the extent of fabric proposed for removal from the building's elevations. As recorded in its list entry, the Haringey Civic Centre was listed partly "for the level of survival of key aspects of the building's character and physical fabric". We will address the glazing and cladding separately: Glazing: - The curtain-walling and windows are a character-defining feature of the listed building's elevations, particularly on the building's principal (east) road-facing elevation. On this elevation, the extensive glazing along with the clearly articulated canopied entrance contribute to the building's public character, communicating its transparency and accessibility. The glazing is original and therefore also has evidential value as surviving historic building fabric. - The applicant proposes the complete replacement of the curtain-walling and windows. This would involve a significant amount of fabric loss and needs to be clearly justified. We feel that this proposal needs greater justification. - If the issue with the glazing is its poor environmental performance then there are other options which are less harmful to the heritage than full replacement that need to be considered, such as secondary glazing. We have not seen evidence that these alternatives have been properly explored. - We would only accept full replacement if the curtain-walling and windows are proven to be in unrepairable condition. The applicant claims that they are "in poor condition" and that Buro Happold has recommended complete refurbishment. We would welcome the opportunity to review this report, which does not appear to have been uploaded with the submitted documents. - If replacement is clearly proven to be the only option, it is essential that the glazing pattern, face proportions, opening movements and finishes match the originals (as the applicant proposes). If double-glazed, potential changes in the glass's reflectivity and tint also need to be examined. Pre-cast concrete cladding panels: - We note that PAYE have recommended full replacement of the pre-cast concrete panes (in their report dated to March 2023). Buro Happold had recommended the replacement of the 3rd floor panels in an earlier report, but PAYE recommends full removal owing to the composition of the concrete and issues with water ingress and reinforcement corrosion, and poor past repair and treatment efforts, all of which makes repair very difficult. We would normally resist fabric removal, but appreciate that replacement may be unavoidable here. - Are there small and isolated areas of cladding where original panels	

	in good or repairable condition could be retained to conserve some of this historic fabric without compromising the building's overall design integrity? - We note that the replacement panels would increase the thickness of the cladding (by 60mm) and that this would change the window depth in relation to the clad surfaces, which perhaps needs consideration? We have no objections to proposals to glaze the covered walkway beneath the rear (west) wing. We appreciate that the glazing would be placed on the inner face of the columns and therefore set back, conserving the character of this space with its pilotis and overhang. Turning to the interiors, we appreciate that interior spaces of high significance, such as the entrance lobby and council chamber, will be retained as existing and preserved. Proposed visuals of the entrance lobby suggest the application of colour to the glazing on the 'flying corridor' bridge – what exactly is proposed here? We welcome proposals to reinstate the suspended, dog-leg acoustic ceiling in the council chamber, which was removed owing to the presence of asbestos, and ask that this is done on a like-for-like basis. We are concerned about the loss of the original plan to the north wing, with its central corridor leading off to cellular offices spaces, through the opening up of the office interiors. We appreciate that a number of rooms with original partitioning, panelling and joinery would be retained as existing, but question if more could be kept to conserve more of the building's original plan form, fabric and character. The applicant notes that the basement included a civil defence suite, built in anticipation of a nuclear war (sections 3.42 and 4.18), as is recorded in the list entry. This was noted in contemporary reviews of the building: - "The office block basement is constructed to 'Class A' air raid loading…" (Architecture and Building, May, 1958). - "The whole of the basement was required to conform to Home Office requirements relating to possible atom bomb attack, with escape tunnels to the external gardens. The basement therefore has walls of 24-inch thick reinforced concrete below a ground floor of similar thickness." (Official Architecture and Planning, June, 1958): The original basement plan is reproduced in The Architect and Building News (Jul 1958) which shows 3 strong rooms with a GPO telephone exchange, switch room, internal telephone exchange, a 'future public shelter', and various offices and stores. The applicant notes that this feature is of 'historic interest', but the architectural and evidential significance of the plan and fabric—which looks to survive well, based on existing plans—appears to have been overlooked. In the significance plans, the applicant identifies the basement as having blanket 'neutral significance'. We challenge this assessment and are concerned about proposals to strip out the basement. We ask the applicant to revise their proposals at this level. We hope that these comments are of use	

	to you. We would welcome the opportunity to visit the site and discuss the proposals with the project team. Please don't hesitate to get in touch if this would be of interest. **Additional Comments received 30 August 2023** The Twentieth Century Society acknowledge receipt of comments made on behalf of the applicant by Montagu Evans responding to our letter dated 21 June 2023. The Society has since been offered the opportunity of a site visit to discuss the proposals, which we undertook on 24 August 2023. Following the site visit, we would like to offer some revised comments in relation to this application. We would like to reiterate our enthusiasm for the proposed use of the site, and for it to regain its original function. This is an exceptional building, and a return to its original use is entirely appropriate for the long-term future of the historic site. While we were on site, however, we were disturbed to learn of a suggested proposal to rebuild the elevations to improve their energy efficiency. The Twentieth Century Society would object strongly to any attempt to rebuild the elevations of this building which would result in substantial harm to the listed building and the loss of the original brickwork, window surrounds and cornicing, all of which are of high significance. Apart from the harm caused to the listed building, the loss of embodied carbon in any rebuilding scheme would far outweigh any occupational benefits achieved and we would caution against such an approach as deleterious to the sustainability of the building. In connection with the comments made in our letter in the curtain walling replacement, the Society has now had sight of further reports on the condition of the glazing and having had the opportunity to examine the windows on site, we consider that sufficient evidence has been provided to that they are beyond repair. We therefore conclude that their removal and replacement is justified. However, we would request that the design of the replacement glazing and window units is conditioned by the council to ensure that the replacement scheme is as close in appearance to the original curtain walling as possible. The pre-cast concrete panels were also a cause for concern for the Society when considering the impact of the proposals on the appearance of the listed building. Again, the site visit has provided further information on the condition of these panels and the feasibility for their retention. We are now satisfied that their replacement here is unavoidable. However, we again request that the replacement GRP panels be conditioned if the council are minded to consent to this application, to ensure that they are specified to give a like-for-like appearance thus minimising the harm caused to the	

	listed building. We were pleased to be made aware that the application of colour to the glazing on the flying bridge in the entrance foyer is to be achieved through the use of coloured film, a reversible change which will not adversely affect this area permanently. Similarly, we received assurances that the council chamber ceiling will be replaced with a like-for-like copy of the original. Turning to the civil defence suite in the basement, we were satisfied from our visit that little physical evidence remains of this facility. We were encouraged by the proposal to add an interpretation board to the external exit of the bunker detailing its history. Although we regret the stripping out of the basement areas, and continue to maintain that they are of some historic significance, we appreciate the need to house plant in this area and that this location is preferable to other potential sites which would cause greater harm to the listed building. We trust that our revised comments are useful in your determination of this application.	