COMMENTOR	COMMENT	OFFICER RESPONSE
Transport for London	Thank you for consulting Transport for London with regard to the above planning application. TfL has the following comments:	INSERT
	1. 45 residential car park spaces are proposed for 146 residential units. This is a ratio of around 0.3 spaces per unit, which TfL deems acceptable.	
	2. 14 disabled vehicle spaces are proposed which TfL deems acceptable.	
	3. 9 of the spaces will have access to Electric Vehicle Charging Points (EVCPs) with a further 9 having passive provision for future use. TfL welcomes this quota of EVCP spaces.	
	4. Residential cycle parking seems to meet minimum requirements set out in the London Plan, which is welcomed.	
	5. Further information is needed to evaluate whether cycle parking for non-residential uses complies with the London Plan. Some of the information was not clear, in particular the number of long and short-stay cycle parking spaces proposed for each non-residential land use, and staff numbers for community land use.	
	6. The location of long stay cycle parking is acceptable. The applicant is reminded that cycle infrastructure and facilities should meet the London Cycle Design Standards (LCDS) in terms of location, access and design in order to fully promote cycling as a transport option. At least 5% of spaces should be able to accommodate either larger or adapted cycles. We welcome the location of short stay cycle parking in the public realm and close to residential blocks, ensuring the cycle parking stands are functional, well-overlooked and attractive.	
	7. TfL welcomes the draft Deliveries and Servicing Management Plan. A full Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) should be secured by condition.	
	8. TfL welcomes the draft Travel Plan. A full Travel Plan should be secured by condition/Section 106 agreement as appropriate.	
	Comments from Buses Network Development	

- 9. Trip generation data separates figures for buses, London Underground and Rail. It is acknowledged that a significant majority of London Underground and Rail trips will also use buses given the distances to the nearest stations. Therefore, the trips attributed to buses in table 6.18 would be 78 or very close to this figure.
- 10. Events held at the development are expected to generate a large number of additional trips. At these times there will not be sufficient capacity on route W7, however given the infrequent nature of capacity events we would not plan the bus network to cater specifically for such occasions. Paragraph 6.4.29 acknowledges that demand due to events would need to be addressed separately.
- 11. There are concerns about the impact the additional passengers would have on the bus network in both peak hours.
- 12. Route W7 is at capacity, particularly towards Finsbury Park Station in the AM peak. As mentioned above up to 78 trips have been attributed to the local bus network in the AM peak. Given that a large number of these trips are jointly attributed to LU/rail services; that Crouch Hill and Finsbury Park are the most accessible stations; and that most trips relate to the proposed residential units, it can be assumed that a significant proportion of the 78 trips would be attributed to route W7 towards Finsbury Park.

Therefore, TfL request a contribution of £475,000 over 5 years as part of the Section 106 agreements. We believe that will be sufficient to offset the impact of this development on additional bus demand. Whilst we believe this would be used to mitigate the W7 route, we would like the flexibility to use this to improve other services that serve the site.

Comments from Bus Infrastructure

13. The nearest bus stop is stop CC located southbound on the A103, which is served by route W7. Given the above mentioned increase in passenger demand for the W7 route, TfL requests a contribution of £15,000 as part of the Section 106 agreement to upgrade the bus stop to meet the needs of the development.

Comments from taxis

14. Given the location of the proposal and the proposed working of the development (day and night time use, food and beverage uses on the ground floor, apartments and a hotel), this development is likely to create demand for taxis and Private Hire Vehicles (PHVs).

- 15. The taxi rank would best manage taxi movements and behaviours, and ensure onward safety of all visitors wanting to continue their journey at night.
- 16. For information on taxi and PHV guidance, please see: https://tfl.gov.uk/corporate/publications-andreports/ taxi-and-private-hire
- 17. Given the above, the applicant should work with TfL to explore the possibility of including a taxi rank as part of the application, and if possible a drop off/pick up bay for PHVs and other vehicles to use. We would expect to see an assessment of options to provide a taxi rank for the hotel and other land uses, which would include an assessment of demand for taxis for the entire day and possible locations for a taxi rank. Given the above, TfL cannot be supportive of the above application until all the points above are addressed.

Updated Comments:

Bus service and bus stop contribution [following TPHS submission]

Thank you for the offer of £150,000 for the W7 service (£75,000 per annum for two years) and £15,000 to upgrade bus stop CC. These are both appropriate contributions and are welcomed. TfL is satisfied that this issue is resolved, and these contributions should be secured in the section 106 agreement.

Taxi rank

We have further queries to ask about the possibility of having a taxi rank as part of this development. We feel this development would be a good opportunity to develop the ranks network and provide facilities for drivers and staff. Therefore, Taxis and Private Hire (TPH) would like to make the following comments:

- 1. As part of the application, the developers put through two options for taxis.
- The first option included locating the rank on parking bays along 'The Broadway' to the north of Rose Place. Please can the developers send an image (screenshot from Google maps will be sufficient) to help us understand if this is a feasible location for a night time taxi rank to serve the venue.
- The second option included extending the existing taxi rank on Crouch End Hill. I'm not sure who from TfL confirmed the two options were feasible but we do not support the extension of the existing

24 hours taxi rank (rank no. 5616) located on Crouch End Hill (outside Foxtons) as the rank is facing in the opposite direction to the venue and so out of sight, thus we are not convinced the rank will work for both passengers or drivers to serve the venue specifically. We also do not encourage drivers to turn in the road or encourage passengers to cross a busy road to get to a cab or the venue.

- 2. Ranks are located so the 'TAXI light' is facing the venue and in sight line to those exiting the venue the rank serves. The rank on Crouch Hill does not appear to meet this requirement.
- 3. At the end of Hatherley Gardens, there is a barrier/gate restricting vehicle access. When the development has been completed, will access be granted to vehicles to enter the outdoor forecourt to load/unload/drop off/pick up etc? If so, we would request that an 'event taxi rank' facility be accommodated here for 4 taxis with the agreement the rank will only operate when there are events on.

The Transport Assessment suggested around half of taxi movements will be associated with departing trips following an event. As part of the 'Event Management Strategy', a rank should operate at this location when events that are likely to attract a large number of visitors to ensure passengers are able to access taxis safely and easily and also ensure faster egress of guests.

- 4. A rank at this location would also support disabled passengers and passengers who may be less able to use other forms of public transport.
- 5. Times of operation/availability of the rank can be agreed with the event managers and subsequently shared to the taxi trade via emails/e-newsletters/social media we have similar arrangements with Alexandra Palace where the availability of the event rank located on the Palace grounds is shared on a monthly basis alongside a monthly events schedule.
- 6. Alternatively, we request a 'Night Time' taxi rank (not be confused with the event taxi rank) to be accommodated on The Broadway, potentially operating from the hours of 19:00 07:00.
- 7. Both the above options would support the TfL 'Safer Travel at Night' initiative. Late night taxi ranks make an important contribution to the safety of the travelling public and also support the late night economy. Ranks help to deter touting and other illegal 'cab' activity and also reduce the risk of people using unlicensed and illegal 'cabs'.
- 8. We have been working with local taxi drivers in and around the Haringey area and appointing new taxi ranks will support these drivers, some of whom will be residents in the Borough. Local drivers are all self-employed and so are in effect local business people and part of the Community this is particularly relevant to a development of this nature where what used to be the old town hall is now being proposed for a new mixed used venue and will accommodate a range of facilities for local residents and the general public.

- 9. Should the application be granted, the development needs to accommodate an Event Management Plan which should include a taxi strategy plan. We would like more clarification. How would the event rank be managed? Who will be managing the rank? What times and when would the rank operate?
 10. 35% of journeys originate from a rank thus supporting the need for a rank at this site. Drivers working in suburban areas also rely on work from ranks as opposed to being hailed.
- London Fire and Emergency Planning Authority

The Brigade has been consulted with regard to the above-mentioned premises and makes the following observations:

The Brigade is not satisfied with the proposals for fire fighting access. as compliance with Part B5 of the building regulations is not shown.

The Authority strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damaged caused by fire and consequential cost to businesses and housing providers, and can reduce risk to life. The Brigade opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our members are public documents made available on our website.

Updated Comments

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outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.

Theatres Trust

I write regarding the above listed building and planning applications for refurbishment, alterations and the change of use of the Hornsey Town Hall. The Theatres Trust supports the application, though please note our comments only relate to the theatre/ Assembly Hall aspects of the proposal. Please see our advice below.

Remit: The Theatres Trust is the national advisory public body for theatres. We champion the past, present and future of live theatre, by protecting the buildings and what goes on inside. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'. Advice: The Theatres Trust is pleased to support this proposal to repair, refurbish and bring the Hornsey Town Hall back in to sustainable and publically accessible new uses, including a range of community facilities. The Grade II* Town Hall complex is currently on Historic England's 'Heritage at Risk' Register and the Trust has engaged with the design team during both the design development and planning application phases to ensure the proposal respects the building's historic and cultural significance. Overall the Trust welcomes the 'light touch' repairs approach (rather than full restoration) and the reorganisation of the Assembly Hall to create a number of flexible and adaptable performance and entertainment spaces, which could be used for theatre, cinema, live music, conferences, weddings, banquets, film shoots, etc. We agree with the justification outlined in the submitted documentation for the alterations, and acknowledge acoustics, the length of the hall and the distance of the balcony from the stage limit the effective use of the rear areas. We therefore support the shortening of the main hall, the creation of a bar/ front of house function space under the balcony and the conversion of the balcony into separate secondary performance space. We appreciate the efforts to reuse the wood paneling and other original features, such as the clocks, in these new spaces. Other insertions, such as the lift and the connection between the new balcony space and the F.49 Committee Room corridor, are significant, but are necessary to make the building fully accessible and to improve circulation between these new spaces. The lift has been carefully located to maintain the symmetry of the foyer and hall and to minimize the impact on the main hall itself, and the overall benefits do outweigh the harm caused.

At our recent meeting with the project architects, the Trust raised the following design and operational issues

for further consideration as the plans are refined:

Stage and Back of House

- -The rear delivery road shows swept paths for vehicles 11m long. The applicant should confirm with the new theatre operators if this will be suitable for the types of sets and props they will need, or if access is required for larger 16.5m articulated vehicles.
- Confirm if the stage/ goods lift (LF.06) is also large enough for the required deliveries.
- Ensure there is enough room in the lift landing (G.60a) at stage level for props to be maneuvered out of the lift and on to the stage. It would be useful to have doors directly on to the stage from the landing, rather than going through the Green Room (G.61).
- The flying system has to be removed or reduced in size to allow for a new access point to the lift landing (G.60a). The operator may be satisfied with a reduced flying system, otherwise, consider 'flipping' the system so the pulley/ ropes are relocated to the opposite wing (G.63).
- -The location of the disabled lavatory in the Green Room (G.61) means the loss of the rear stage cross over. An additional door should be provided to access stage right (wing G.63) to maintain flexibility for performances.
- -Access to the ladies dressing room (F.51) has two steps, so is not wheel chair accessible. If access can't be provided without the loss of historic features, it would be useful to reorganise the disabled lavatory in the Green Room so it is a fully accessible dressing room.
- Safety laws require separate dressing rooms for adults and children. For shows with large casts, consider how the large dressing rooms may be sectioned off to accommodate this.
- Consider the installation of a shower(s) in the dressing rooms.

Auditorium

- Good acoustics will be vital to the success of the venue. We note that sound insulation to protect the adjoining uses will be largely addressed with the replacement roof, new ceiling, and the double glazing to the windows. But is also important that further consideration is given to the acoustics for a performance in the hall, particularly as the new rear wall and the bleacher seating will change how noise projects around the room. Additional baffles on the walls, or hanging from the ceiling, etc. may be needed and we would recommend an acoustic study is undertaken to determine the best approach.
- We welcome the use of bleacher seating which retains the flexible flat floor use. However, bleacher seating may be heavy and it will be important to ensure the structure underneath can support the additional loading. We also recommend reviewing how the bleacher structure will affect the effectiveness of the sprung floor.
- Identify how to sensitively blackout the windows and roof lanterns, if needed by the operator, for day time performances.
- There is no dedicated dressing room/ performer space for the new balcony studio (F.50). We strongly

recommend at least one is provided to support the use of this room as a live performance space and, depending on levels, suggest the plant next to stair ST.14 be relocated to provide this space. Foyers

- While we welcome the reinstatement of the original layout and doors of the vestibule (G.49), we recommend further consideration be given to how a draught lobby, or alternative, could be sensitively installed to maintain the conditions within the foyer during the winter months.
- The new box office in the former cloak room (g.50) will become a pinch point with only one door in and out, particularly as it is directly next to the front entrance doors where queues may block the entry. We strongly recommend keeping the existing corridor through the cloak room to allow the audience to circulate past the box office and out the second door to maintain a suitable flow of people. This will mean reorganisation of the accessible toilets in G.50a.
- Additional toilets, particularly for the Supper Room (LG.40) would be beneficial, as provision (mainly female facilities) is under the recommended guidelines for performance venues.
- -The shared foyer and public spaces with the adjoining hotel, café and restaurant will have to be carefully managed and the various operators will need to coordinate their activities to avoid conflicts between each use.

Apart from the benefits of the building's reuse and restoration, the Trust hopes this revitalised and expanded venue will become a highly valued local facility which will expand cultural provision and opportunities within Crouch End. The Trust therefore recommends granting listed building and planning permission, attaching conditions as appropriate. Please contact us if we may be of further assistance.

Historic England

2nd October 2017 – 1st Submission

Town Hall - Planning Permission

Thank you for your letter of 1 August 2017 notifying Historic England of the above application.

Summary

In terms of our remit, Historic England has a statutory role in providing expert advice on proposals affecting the built historic environment and recommend the authorisation of listed building consent applications for grade II* listed buildings to the Secretary of State for determination. Please note that it is not within our remit to comment on the proposed uses, only insofar as they impact on the fabric and special interest of the listed building. We are also a consultee on any large planning applications affecting the setting of a grade II* building or conservation area.

In principle, we welcome the proposed repair, refurbishment and reuse of Hornsey Town Hall and consider this work to be a significant heritage benefit. As such, we have prepared our letter of direction on the application for listed building consent.

In relation to the proposed new residential buildings at the rear of the Town Hall, we have concerns regarding the impact of these buildings on the character and setting of the Town Hall and the surrounding conservation area. We would therefore urge your authority to consider negotiating changes to the scheme to mitigate this harm. We also draw your attention to the need to balance any harm caused against the heritage benefits of the proposals, including optimum viable use, in accordance with policy 134 of the National Planning Policy Framework.

Historic England Advice

Significance

Hornsey Town Hall is a grade II* listed building and is therefore of high heritage significance. The Town Hall was constructed in 1935 to designs by RH Uren and was the first major UK building to be constructed in the modernist style. The building has remained largely unaltered and retains many features of architectural and historic interest, including a number of high quality interiors and finishes, some of which were implemented in association with Heales stores. The building has been vacant for many years, following the dissolution of the borough of Hornsey, and is an entrant on our Heritage At Risk Register for London.

The site also includes a number of other grade II listed buildings, which are also by RH Uren and surround the square infront of the Town Hall, as well as a small health centre, 'Weston Park Annex', which dates from the early 20th century and is a designed in the neo Georgian style. The site is located within the Crouch End Conservaiton Area, which is particularly noted for its Edwardian high street and suburban character, with the civic buildings, including the Town Hall and library complex, presenting a striking later layer of development sitting at the heart of the conservation area.

Impact

The proposals for the Town Hall show the main entrance lobby spaces, the former theatre, Mayor's Office, Committee Chamber and Committee Room being available for community or hotel use and remaining largely unaltered. The upper part of the theatre seating area would be converted to a new function room. The

ground floor of the south wing and the first floor of the west wing would be used as co-working spaces. The remaining interiors would be used for food and beverage use or as hotel bedrooms or ancillary facilities. To the east, west and south wings, the proposals would include the retention of much of the existing office corridor spaces and the subdivision of the existing offices to create hotel bedrooms and bathrooms. The existing roof top extension over the East Wing would be demolished and replaced by new extensions that would flank the existing stair core and which would be designed to reflect the architecture of the existing building below.

On the land at the rear of the Town Hall, it is proposed to erect two residential blocks, the proportions of which are taller in height to those previously granted planning permission as 'Enabling Development' linked to the restoration and reuse of Hornsey Town Hall (Mountview scheme). One of those blocks, Block B, would be adjoined to the East Wing and would therefore compirse an extension to the Town Hall.

Policy

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

Paragraphs 132 and 137 consider the impact of that development on the setting of historic assets.

Paragraphs 133 and 134 advise on cases where proposals would lead to substantial or less than substantial harm to the significance of a designated heritage asset. In both cases, harm needs to be weighed against public benefits, although the tests in 133 for substantial harm are necessarily more rigorous.

Position

It is clear that the applicants have given a great deal of consideration to the significance of the Hornsey Town Hall when formulating the proposed plans for conversion of the building to new uses. This has resulted in

proposals that largely retain original fabric and plan form and are less interventionist than the previously consented Mountview scheme. In our view, the current proposals are acceptable, subject to conditions requiring details of all works (please see proposed letter of direction).

In respect to the proposed extensions and external changes to Hornsey Town Hall, we have no objection to the repositioning of the steps to the theatre foyer in order to provide level access across the front of the building. This is providing that existing fabric is reused wherever possible and that the design of the new fabric is seamless with the architecture of the Town Hall and we have therefore sought to cover the detailed design under condition. We have no objection to the provision of an external terrace and bar over the existing roof area on the north side of the building, provided that any associated structures are not visible in key views looking towards the Town Hall from The Broadway and can be accommodated without any harmful alterations to the host building. The proposed extensions over the east wing at second floor level appear to be follow the principle set in the Mountview scheme and we have again sought to cover the detailed design udner condition.

Regarding the proposals to re-landscape the front area, we welcome the partial reinstatement of the original landscaping scheme at the front of the Town Hall, whilst also allowing for renewal of the existing finishes. We particularly welcome the restoration of the circular fountain and the reinstatement of lamp standards in the style of those that originally existed.

In respect to the new build residential blocks at the rear of the site, we would not wish to comment on their detailed design. However, we are of the view that the proposed increase in height to both Blocks A and B, over that originally granted permission in the Mountview Scheme, will result in harm to the historic environment. The increase in height of Block A will result in this building appearing in a number of local townscape views, and particularly in the context of the suburban Edwardian villas that characterise the streets to the rear of the site. The proposed building is seen to rise above the general development plane and to visually interfere with the interesting rooflines of those Edwardian villas. The increase in height of Block B will result in this building appearing just above the roofline of the Town Hall in views from The Broadway and therefore interfering with the clean reclarlinear roofline of the Town Hall. The visibility of Block B is further increased due to the use of contrasting materials and colour palate. We would welcome changes to the scheme to mitigate the harm that we have identified. However, we are aware that the final decision on these planning issues will lie with the Council, as local planning authority, and we would therefore urge the Council to seek changes, where possible, whilst also balancing these potential changes agains the heritage benefits that would result from the repair and reuse of the Town Hall, in accordance with policies within the NPPF.

In relation to the proposed new build at the rear, we understand that this was considered to be 'Enablind Development' under the Mountview scheme. Accordingly, the delivery/occupation of this new build was tied to the phasing and delivery of the Town Hall scheme of repair and refurbishment. The heritage benefits of those proposals were clear and were also seen to justify the demolition of the Weston Park Annex, which is considered to be a building of some architectural and historic interest. In the current planning submission, there is no reference to the scheme being considered as Enabling Development, with the justification for this approach being that the scheme is planning compliant. We would therefore urge your Council to ensure that the scheme is compliant with policies, but also to seek a mechanism that ensures that the delivery/occupation of the new buildings is linked to the phasing and delivery of the Town Hall scheme. If this is not the case, then the relationship between the viability of the Town Hall as a stand alone element needs to be questioned. If the Town Hall is not considered to be a viable entity its own right or its viability would be compromised by development at the rear, then there is certainly an arguement that could be made for the proposals causing unacceptable harm on viability grounds, in accordance with policy 134 of the NPPF.

Recommendation

In principle, we welcome the proposed repair, refurbishment and reuse of Hornsey Town Hall and consider this work to be a significant heritage benefit and recommend approval of the current listed building consent application. We have therefore issued our letter of authorisation for the listed building consent, which will need to be authorised by the Secretary of State. In relation to the proposed new residential buildings at the rear of the Town Hall, we have concerns regarding the impact of these buildings on the character and setting of the Town Hall and the surrounding conservation area. We therefore urge your authority to consider negotiating changes to the scheme to mitigate this harm and to link the delivery/occupation of the new buildings to the delivery of the repair and refurbishment of the Town Hall. We draw your attention to the need to balance any harm caused against the heritage benefits of the proposals, including optimum viable use, in accordance with policy 134 of the National Planning Policy Framework.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please note that this response relates to historic building and historic area matters only. If there are any

archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice.

<u>Updated Comments – Planning Permission</u>

Please note that this comment follows on from our previous letter of 2nd October 2017, in which we welcomed the proposals to repair, refurbish and reuse Hornsey Town Hall and consider this work to be a significant heritage benefit.

We have reviewed the amended proposals, which include changes to the height of proposed Block B, which is located at the rear of Hornsey Town Hall. We particularly welcome the reduction in the height of Block B, which should ensure that it is no longer visible in the backdrop setting of the Town Hall when viewed from The Broadway (as illustrated in View 01 of the Townscape Aseessment). We no longer consider the proposals to cause harm to the setting of the Town Hall and the surrounding conservation area in this view and acknowledge that in other views, particularly Winter View 02, the scale of the proposed buildings is similar in nature to the buildings that were previously granted planning permission. It should be noted that the previous permission considered those buildings to comprise 'Enabling Development', thereby securing significant heritage benefits through the repair and reuse of the Town Hall.

In accordance with our letter of 2nd October 2017, we would continue to urge your Council to agree a mechanism to ensure that the delivery/occupation of the new buildings is linked to the phasing and full delivery of the Town Hall scheme, regardless of whether or not the current scheme strictly accords with the definition of 'Enabling Development'.

Listed Building Consent – Town Hall

your authority is minded to grant listed building consent for the application referred to in the schedule above, you are hereby directed to attach the condition(s) set out below, in addition to any which your Council is minded to impose.

Your Council is also directed not to approve the matters of detail to be

submitted in pursuance of Condition(s) No 1-17 without first submitting these to and obtaining the approval in writing of Historic England.

Informative: The works hereby approved are only those specifically indicated on the drawing(s) and/or other documentation referred to above.

Informative: The works hereby approved are only those specifically indicated on the drawing(s) and/or other documentation referred to above.

- 1. The works hereby permitted shall be begun before the expiration of 3 years from the date of this consent.
- 2. Prior to any works of demolition or alteration to the Town Hall, evidence of contract(s) for the carrying out of the completion of the entire scheme of works to the Town Hall shall be submitted to and accepted in writing by the Council as local planning authority.
- 3. Prior to works of demolition of any buildings within the site or alteration to the Town Hall, a phased programme for carrying out the approved works to the Town Hall shall be submitted in writing to and for approval by the Local Planning Authority, in consultation with Historic England. The programme shall take into account the delivery of the new build elements of the scheme alongside the delivery of the repair, refurbishment and fit out of the Town Hall. The development shall be constructed in accordance with the approved programme, unless agreed in writing with the Local Planning Authority.
- 4. All new external and internal works and finishes and works of making good to the retained fabric, shall match the existing adjacent work with regard to the methods used and to material, colour, texture and profile, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.
- 5. Any areas of new facing brickwork to the Town Hall shall match the existing brickwork adjacent in respect of colour, texture, face bond and pointing, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent.
- 6. Any hidden historic features which are revealed during the course of works shall be retained in situ. Works shall be immediately suspended in the relevant area of the building upon discovery and the Local Planning Authority notified. Works shall remain suspended in the relevant area until the Local Planning Authority authorise a scheme of works for either retention or removal and recording of the hidden historic features.

- 7. All redundant plumbing, mechanical and electrical services and installations shall be carefully removed from the listed building before the completion of the consented works to the Town Hall hereby approved, unless agreed in writing with the Local Planning Authority.
- 8. In the event the removal of redundant plumbing, mechanical and electrical services and installations within the Town Hall reveals visual inconsistency in the appearance of the building fabric, the retained building fabric shall be made good with regard to material, colour, texture and profile of the existing building.
- 9. Prior to the commencement of any relevant works, details in respect of the following shall be submitted to and approved in writing by the Council as local planning authority in consultation with Historic England before the relevant work is begun.
- a. Details of structural repairs, including relevant method statements;
- b. Details of all repairs and alterations to external windows, doors and associated ironmongery, including details of proposed secondary glazing and any acoustic and environmental upgrades to existing windows. Details shall include method statements;
- c. Details of repairs and alterations to panelling, decorative finishes and metalwork, including staircase balustrades, balconies and glazed screens. Details shall include method statements;
- d. Details of proposed works to entrance foyer spaces, including proposed new internal ramp;
- e. Details of proposed works to Council Chamber;
- f. Details of proposed works to Committee Room;
- g: Details of proposed works to Committee Room Corridor;
- h. Details of proposed works to Assembly Hall;
- i. Details of proposed works to all panelled rooms;
- j: Details of proposed repairs and alterations to circular fountain and entrance arrangements on the Town

Hall Square side of the building;

k: Samples of new facing materials to the Town Hall and the proposed new build elements, including the new external access route to the Assembly Hall foyer, the east wing roof extension and Block B;

I: Details of proposed services, including plumbing, mechanical, electrical, data services. Details should include position, type and method of installation of services, as well as any associated risers, conduits, vents and fittings;

m: Details of proposed lighting

The relevant work shall be carried out in accordance with such approved details

10. Prior to the moving or removal of ANY historic item from or within the Town Hall, a full schedule of ALL historic items to be moved within or removed from the building shall be submitted in writing to and for approval by the Local Planning Authority, in consultation with Historic England. The schedule shall be accompanied by a Salvage Strategy, which is to include a methodology for removal, storage, reuse and disposal of historic items.

The handling of historic items shall be in accordance with the approved schedule and Salvage Strategy thereafter unless agreed in writing with the Local Planning Authority.

- 11. Prior to works of demolition or alteration to the Town Hall, structural engineers' drawings and a method statement, shall be submitted in writing to and for approval by the Local Planning Authority, in consultation with Historic England. The drawings and statement shall demonstrate the safety and stability of the building fabric to be retained throughout the period of demolition and reconstruction. The development shall be carried out in accordance with the approved drawings and method statement.
- 12. Prior to works demolition or alteration to the Town Hall, details of a program to secure interior features against loss or damage during building works (including potential theft during construction) shall be submitted in writing to and for approval by the Local Planning Authority. The development shall be undertaken in accordance with approved details.
- 13. Before any masonry cleaning commences, details of a masonry cleaning program and methodology shall be submitted in writing to and for approval by the Local Planning Authority in consultation with Historic

England. The program shall demonstrate protection of internal and external surfaces. The cleaning program shall be undertaken in accordance with approved details.

- 14. Prior to the use of any part of the Town Hall (including proposed extensions) for commercial or community use, a Heritage Management and Maintenance Plan shall be submitted in writing to and approved by the Council in consultation with Historic England. The plan shall include a program for regular survey, repairs and maintenance of the building following completion of the development.
- 15. Prior to relevant extension works and notwithstanding any plan or document hereby approved, details of materials of the roof extension to the east roof of the Hornsey Town Hall shall be submitted in writing to and for approval by the Local Planning Authority. The details shall be submitted following consultation with Historic England. The roof extension shall be constructed in accordance with approved materials.
- 16. No new plumbing, pipes, soilstacks, flues, vents or ductwork shall be fixed on the external faces of the building unless shown on the drawings hereby approved, or submitted to and approved by the Council in consultation with Historic England.
- 17. No new grilles, security alarms, lighting, cameras or other appurtenances shall be fixed on the external faces of the building unless shown on the drawings hereby approved, or submitted to and approved by the Council in consultation with Historic England.

STANDARD REASONS FOR THE AFOREMENTIONED CONDITION(S)

In order to safeguard the special architectural or historic interest of the building.

Comments Broadway Annex

Thank you for your letter of 1 August 2017 notifying Historic England of the application for listed building consent relating to the above site. On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions, details of which are enclosed.

Comments Hornsey Library

Thank you for your letter of 1 August 2017 notifying Historic England of the application for listed building

consent relating to the above site. On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions, details of which are enclosed. Thank you for your consultation dated 01 August 2017. The Greater London Archaeological Advisory Service Historic (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy England -Framework and GLAAS Charter. Archeological Service The planning application lies in an area of archaeological interest: Crouch End Village Archaeological Priority Area. The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available. Previous advice for this site has been for an archaeological condition to be applied to the consented scheme. I have reviewed the most recent archaeological desk based assessment (CgMs, July 2017) and I can confirm that our advice in regards to archaeology remains unchanged. A historic Building Recording condition was also attached to the previous consented scheme. The applicant has submitted, with the current application a Historic Building Report (Donald Insall Associates, July 2017). This document is a highly detailed report with thorough archive research, and is comparable to the Level 3 Standing Building Recording Report. In light of this, unless required by the Conservation Officer. I am happy for the Historic Building Recording condition which was attached to the previous consented scheme to be waivered in this instance. Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates the need for field evaluation to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a two-stage process of archaeological investigation comprising: first, evaluation to

clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. The archaeological interest should therefore be conserved by attaching a condition as follows:

Condition No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are

present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

The results of the evaluation should aim to inform the scope for any further archaeological mitigation. Further information on archaeology and planning in Greater London including Archaeological Priority Areas is available on the Historic England website.

Please do not hesitate to contact me should you require further information or assistance. I would be grateful to be kept informed of the progress of this application.

Natural England

Thank you for your consultation on the above dated and received by Natural England on 01 August 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The Wildlife and Countryside Act 1981 (as amended)

The Conservation of Habitats and Species Regulations 2010 (as amended)

Natural England's comments in relation to this application are provided in the following sections.

Statutory nature conservation sites – no objection

Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

Protected species

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk.

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Updated Comments

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 18 August 2017.

The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Updated Comments II

Natural England has previously commented on this proposal and made comments to the authority in our letters dated 18 August, 2017 and 20 September 2017.

The advice provided in our previous response applies equally to this amendment although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Thames Water

Waste Comments

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

There are public sewers crossing or close to your development. In order to protect public sewers and to

ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit thameswater.co.uk/buildover Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Water Comments

Thames Water recommend 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.

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 water 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 water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

	Supplementary Comments	
	Surface Water disposal to follow The Mayor of London Drainage Hierarchy.	
Metropolitan Police	Thank you for allowing us to comment on the above planning proposal.	
Designing Out Crime Office	With reference the above application I have now had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on available information, including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.	
	1.0 It is my professional opinion that crime prevention and community safety are material considerations, because of the proposed use, design, layout and location of the development proposed.	
	1.1 To ensure the delivery of a safer development in line with Local Development Framework policies CP17, DC33 and DC63 (See Appendix for details of these policies), I have highlighted some of my main areas of concern in Section 3 and in Section 4 have recommended the attaching of a suitably worded condition.	
	Recommendations: 2.0 I can confirm that I have met with the project architects on the 25th August 2017 in order to discuss their aspirations for the site. Both Pc Warwick and I have reviewed the planning application and due to the areas of concern (See 3.0 below) the Metropolitan Police request a specific condition requiring the developer to achieve Secure by Design accreditation for the entire proposed development. Concerns: 3.0 In summary, officers from the design out crime team have a number of site specific concerns in relation to	
	this application and these are outlined in Appendix 3. However a condition requiring the developer to engage with both the police and the local authority to achieve 'secured by design' accreditation/status, would reassure police and mitigate a many of these concerns.	
	Community Safety – Secured by Design Conditions:	
	4.0 Crime prevention and community safety are material considerations. If the L.B. Haringey are to consider granting consent, I would ask that the conditions detailed below be attached. This is to mitigate the impact and deliver a safer development in line with national, regional and local planning policies. I would also like to draw your attention to Section 17 CDA 1988 and the NPPF, (See appendix) in supporting my	

recommendations.

4.1 (1) I request that prior to carrying out above grade works of each 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 full Secured by Design' Accreditation.

The development shall only be carried out in accordance with the approved details.

- (2) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation shall be obtained for such building or part of such building or use.
- (3) The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.

Crime Figures:

- 5.0 Crime and disorder is a factor for consideration with this application. Crime data affecting this application are highlighted in appendix 2 below. Legislation & SBD Guidance:
- 6.0 SP11: Design All new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this all development shall:

Incorporate solutions to reduce crime and the fear of crime, such as promoting social inclusion; creating well-connected and high quality public realm that is easy and safe to use; and by applying the principles set out in 'Secured by Design' and Safer Places;

Seek the highest standards of access in all buildings and places;

6.1 Whilst I accept that with the introduction of Approved Document Q of the Building Regulations from 1st October it is no longer appropriate for local authorities to attach planning conditions relating to technical door and window standards I would encourage the planning authority to note the experience gained by the UK police service over the past 26 years in this specific subject area.

That experience has led to the provision of a physical security requirement considered to be more consistent

than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body).

This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product.

I would therefore request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website. www.securedbydesign.com .

Conclusion:

I would ask that my interest in this planning application is noted and that I am kept appraised of developments. Additionally, I would welcome the opportunity of sitting in on any meeting you might have concerning this proposal. Should the Planning Authority require clarification of any of the above comments please do not hesitate to contact me at the above office. Yours sincerely.

Pc Karl Turton 687TP Designing Out Crime Officer Metropolitan Police Service

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

Appendix 1:

SP11: Design All new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this all development shall: Incorporate solutions to reduce crime and the fear of crime, such as promoting social

inclusion; creating well-connected and high quality public realm that is easy and safe to use; and by applying the principles set out in 'Secured by Design' and Safer Places; Seek the highest standards of access in all buildings and places; DC63 DELIVERING SAFER PLACES from the Development Control Policies DPD sets out that planning permission will only be granted for proposals which suitably address a set of aims that reflects the seven attributes of sustainable communities linked to crime prevention, as set out in the Communities and Local Government publication 'Safer Places – The Planning System and Crime Prevention'. Applicants are required to adopt the principles and practices of the 'Secured by Design' scheme in the application of this policy.

DC33 CAR PARKING from the Development Control Policies DPD sets out that private off-street car parking in new developments needs to achieve Secured by Design standard (or equivalent methodology).

The Supplementary Planning Documents 'Designing Safer Places' and 'Landscaping' provide further additional guidance supporting the recommendations. Section 17 of the Crime and Disorder Act 1988 states "It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in it's area", as clarified by PINS953. The National Planning Policy Framework (NPPF) states that "Planning policies and decisions should aim to ensure that developments create:

• Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion

Appendix 2: Crime Figures:

The crime figures provided below are publicly available on the Internet at http://www.met.police.uk/crimefigures/. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behavior and disorder both of which have a negative impact on quality of life issues.

Havering is one of 32 London Boroughs policed by the Metropolitan Police Service. It is promoted as one of the safer boroughs, but nonetheless crime and disorder are still a major issue for its residents.

The following figures relate to recorded crime data from Police.uk

Appendix 3:

1. Both Pc Lee Warwick and I have had a consultation with the developer on the 25th August and subsequent email and phone calls have then taken place.

After reviewing the application documents and conducting a site visit to visualise the proposed scheme and its impact on the locality both I and Pc Warwick have concerns' regarding the access path from Weston Park at the northern edge of the proposed site, to Haringey park in the south.

An access route open to the public without suitable controls would allow levels of permeability that would undermine the security of a number of key aspects of the proposed scheme.

Officers can see where access to stake holders of the proposed development would be advantageous but for this to be managed successfully it would have to rely on robust access control.

2. There are similar concerns over access between Town Hall, hotels and residential aspects of the scheme which could be mitigated by adherence to the Secured by design scheme and the recommendations it would generate.

The sustainability of this dynamic scheme involving the construction of new civic buildings, meeting rooms, hotel and residential realm will rely on the following factors:-

- 1. Intelligent design
- 2. Proportionate access control
- 3. Quality (certified) security products.
- 1.0 General recommendations.

1.1 Building sight lines should be kept as simple as possible. Complex building shapes, unless very well overlooked, create hiding places which reduce both natural surveillance and the effectiveness of closed circuit television systems (CCTV). Recesses create congregation points, which are a focal point for crime and anti-social behaviour, potentially leading to littering, graffiti, vandalism, arson and drug dealing. Such locations can often also become 'informal urinals'. Where possible, buildings should be orientated to maximise natural surveillance (from passers-by and/or passing traffic) and formal surveillance (CCTV) opportunities.

It is advisable to provide secure storage areas for outside furniture, beer kegs, waste storage, external freezers, etc. Where exterior structures are present, they should be secure and not act as informal climbing aids.

Waste bottle bins or other waste storage facilities which may contain empty drinking receptacles should, where possible, be securely locked, stored away from public access and fixed to a secure base (if not in a locked compound). This will not only remove the potential opportunity of such receptacles being misused i.e. thrown, used as a climbing aid or being tipped over onto the street or surrounding area.

External areas should be kept clean and tidy, to discourage vandalism and promote a culture of respect and care. An unkempt site suggests a casual attitude and can promote vandalism and anti-social behaviour.

1.2 External Doors

- 1.3 External doorset apertures
- 1.4 It is important that the doorset aperture is protected. Due to the nature of some licensed premises and locations, there is an expectation that the security will be required to meet one or more of the following minimum standards when the building is unoccupied:
- PAS 24:2012 or PAS 24:2016 (Note 55.1a);
- STS 201 Issue 4 (Note 55.b);

- LPS 1175: Issue 7.2, Security Rating 2+ (Note 55.1c);
- STS 202: Issue 3, Burglary Rating 2 (Note 55.1c);
- LPS 2081 Issue 1 Security Rating B+ (Note 55.1d).

Additional security may be gained by utilising additional protection such as a certified roller shutter or grille, as described in Section 2, paragraphs 50 or through the use of a doorset certified to higher security standards in the following circumstances highlighted in Section 2, paragraph 55.3. Note 55.1a: Both PAS 24:2012 and PAS 24:2016 embody two alternative test regimes to demonstrate compliance with the standard:

- The traditional UK PAS 24 test methodology; or
- Via BS EN 1627:2011 Resistance Class 3 (which references BS EN

1628, 1629 and 1630), with additional test criteria to address known criminal methods of entry within the UK (which are not sufficiently catered for within the European Standards).

NB: If manufacturers wish to use the European Standards as a route to compliance to PAS 24:2012, then all testing must be conducted in accordance with the latest published version of the 'UK Police Service Secured by Design (SBD) Interpretation Document for BS EN 1627:2011, BS EN 1628:2011, BS EN 1629:2011 and BS EN 1630:2011'. This document can be found on the Secured by Design Website within the 'Test Standards Explained' section.

Note 55.1b: STS 201 is the unique reference number for Warrington Certification's published standards, replicating the requirements of PAS 24:2012. Note 55.1c: LPS 1175 and STS 202 are unique to the respective certification bodies and incorporate a physical attack on the glazed areas within doors and windows. Specifiers should satisfy themselves that the glazing incorporated within products certified to these standards meets the required thermal performance and durability requirements for the specified application. Note 55.1d: LPS 2081 is a new standard that utilises a similar methodology to that used in LPS 1175, but the attacks are designed to use stealth (low noise levels). It may therefore be more applicable to residential applications.

1.5 If glazed panels are installed adjacent to the doorset and are an integral part of the door frame then they should be tested as part of the manufacturer's certificated range of door assemblies. Alternatively, where they are manufactured separately from the door frame, they shall be certificated to either:

- PAS24: 2012, PAS24:2016 or STS 204;
- LPS 1175: Issue 7, at a Security Rating to match the doorset;
- LPS 2081: Issue 1, at a Security Rating to match the doorset;
- STS 202: Issue 3, at a Burglary Rating to match the doorset.

Doorsets must be certificated by one of the following UKAS accredited certification bodies (Note 55.4):

- Exova BM Trada Certification
- British Board of Agrément (BBA)
- British Standards Institute
- British Woodworking Federation (BWF)
- Loss Prevention Certification Board (part of BRE)
- Exova Warringtonfire
- ER Certification
- UL Certification (UK) Ltd
- Buildcheck Certification
- Steel Window Association
- · Wintech Engineering Ltd
- IFC Certification Ltd

Note 55.4: Certificated products undergo continuous assessment to ensure that product standards are maintained.

1.6 49 Glazed curtain walling and window walls

SBD recognises four distinct types of glazed wall systems. These are:

- i. Large glazed units connected by a spider clamp system;
- ii. Glazed units directly retained within a framing system (usually aluminium);
- iii. Framed windows installed within a separate framing system;
- iv. Framed windows connected to other framed windows to create a 'window

wall'.

- 1.7 Glazed curtain walling (i and ii above) must be installed using a secure glazing retention system. The method of retaining the glass must include one or more of the following:
- · Security glazing tape;
- · Dedicated security sealant or gasket;
- A secure mechanical fixing system (evidence will be required to prove the system is secure. This may be achieved by utilising the specific glazing retention test within PAS 24:2012, PAS 24:2016 or by an indicative test on the retention system to LPS 1175: Issue 7 SR1, LPS 2081 Security Rating A or STS 202: Issue 3, BR1).
- 1.8 Framed windows (iii and iv above) used within the construction of a 'window wall' must meet the requirements in Section 2, paragraphs 64.
- 1.9 Attack resistant glazing, as defined in Section 2, paragraphs 61 to 61.3, is required where the glazing is easily accessible (see glossary of terms).

The following British Standard 'Codes of Practice' are relevant:

- BS 5516-1: 2004 Patent glazing and sloping glazing for buildings. Code of practice for design and installation of sloping and vertical patent glazing;
- BS 5516-2: 2004 Patent glazing and sloping glazing for buildings. Code of practice for sloping glazing.
- 1.10 Roof design and access and aids to climbing
- 1.11 Preventing easy access to roofs should be considered at the design stage of the building. This is particularly important in public areas of the premises, where there may be a risk of reckless behaviour by customers under the influence of alcohol.
- 1.12 External rainwater pipes can be used for climbing and should be either square or

rectangular in section, flush fitted against the wall or contained within a wall cavity or covered recess. Bends in pipes and horizontal runs should be minimised. Physical barriers should be used to prevent access to an existing roof. Pipes should be made of fire-resistant material.

1.13 Flat roofs, particularly those at a low level, may be more easily accessed and, depending on their construction materials, may be more vulnerable to intrusion either by cutting through the deck or forcing open roof lights and other openings

Note 24.3: Attention is drawn to relevant legislation (including the Occupier's Liability Act 1984) concerning the responsibilities and liabilities of building owners/occupiers for the safe use of roof areas and relevant signage.

1.14 Window Apertures

Protection of window apertures

It is important that the window aperture is protected. Due to the nature of some licensed premises and locations, there is an expectation that the security will be required to meet one or more of the following minimum standards when the building is unoccupied:

- PAS 24:2012 or PAS 24:2016 (Note 64.1.1);
- STS 204 Issue 3: 2012 (Note 64.1.2);
- LPS 1175 Issue 7:2010 Security Rating 1;
- LPS 2081 Issue 1:2014 Security Rating A.

Note 64.1.1: Both PAS 24:2012 and PAS 24:2016 embody two alternative test regimes to demonstrate compliance with the standard:

- The traditional UK PAS 24 test methodology; or
- Via BS EN 1627:2011 Resistance Class 2N (which references BS EN 1628, 1629 and 1630), with additional test criteria to address known criminal methods of entry within the UK (which are not sufficiently catered for within the European Standards). Please note: whilst the UK have selected Class 2N (and hence there is no performance requirements required under the

European standard), there is still a requirement for all emergency egress windows without locking hardware to be installed with laminated glass conforming to BS EN 356 Class P1A (min).

Note 64.1.2: STS 204 is the unique reference number for Warrington Certification's published standards replicating the requirements of PAS 24:2012.

- 1.15 Smoking and external drinking areas
- 1.16 The law dictates that the smoking customer should not occupy any entrance or exit doorway. Therefore all licensed premises should plan for a smoking area as part of its operation. Such areas should ideally be located in the least intrusive space; where smokers and non-smoking members of the public are unlikely to gather together and confrontation is minimised.
- 1.17 Smoking or external drinking areas located in licensed premises, where the customer must pass through a controlled area or search facility prior to entering the establishment, should be covered by adequate levels of lighting and eye level CCTV. Such facilities should ideally be located in areas of the building that are not accessible from a street or other uncontrolled area, this is to prevent unauthorised access or the supply of items (e.g. drugs and weapons) being passed through to customers within the facility.

2.0 Perimeter treatments

2.1 The height of the fence will be determined by local circumstances, crime risk and the system chosen. In most circumstances heights between 1.2m (demarcation) and 2.4m (higher security) will be appropriate. Lower heights of fencing (1.2m to 1.6m) are suitable for boundary demarcation and controlling movement only and not for security, the height of security fencing will generally start at 1.8m and above. It is normally preferable that the perimeter fencing allows clear views over the commercial buildings and the grounds from the surrounding land and buildings. Dark colour finish to fencing reduces the reflection of light and therefore makes it easier for passers-by to observe activity within the grounds/premises.

- 2.2 Where the fence panel is of a pale or slat design, they should be oriented vertically to avoid step-up points for climbing and able to resist being pried off or removed. They should be no less than 25mm thick timber or tubular steel with a wall thickness no less than 1.5mm, and securely affixed to the frame or rails.

 2.3 Where a fence panel is constructed of welded mesh, the gaps between the mesh strands must be small enough to resist climbing.
- 2.4 The method of fixing between panel or rails and posts should create a secure mechanical bond so that panels or slats cannot be easily removed, in addition, they should provide a chain linking effect where each panel and post acts in concert with the next to resist attack by pushing and pulling.

2.5 Security fencing

- 2.6 The fixings employed in the panel or pale to rail construction should be of galvanized steel or stainless steel with a design life to match the fence or gate. 2.7 Fence (rear and side) heights should be of a minimum 1.8m overall and be capable of raking or stepping to maintain height over different ground levels, without creating gaps underneath.
- 2.8 Posts should allow the construction of an unbroken panel to post chain and be of a non-brittle material.

2.9 Gates

2.10 The design, height and construction of any gates within a perimeter fencing system should match that of the adjoining fence and not compromise the overall security of the boundary and again be to a minimum of 1.8m in height. Pedestrian gates should be of a framed design and employ galvanized adjustable hinges and fixings mounted behind the attack face. On outward opening gates, where the hinges or brace is mounted on the attack face, fixings should be of a galvanized coach bolt design. Gates should be fitted with locks, as agreed with the DOCO. The gate design and fixing features should match that of the fence 2.11 Entrance gates should be inward opening, of substantial framed construction and employ galvanized adjustable hinges and fixings mounted behind the attack face. Gates should be fitted with galvanized drop bolts and a facility for

padlocking (manual gates) or electro-mechanical locking (automated gates) and employ mechanical/electro-mechanical devices, as applicable, to hold gate leaves in the open position. The locking method must be agreed with the DOCO. The gate design and fixing features should match that of the fence

- 2.12 The tops of timber fences should finish flush with the neighbouring posts and a securely fixed capping rail should run across the fence and posts to create a continuous chain. The tops/top rail/capping of fencing and gates should be of a design able to accommodate a security topping to deter attempts to scale over the perimeter.
- 3.0 Lighting general
- 3.1 A good lighting scheme is one that has been designed to be energy efficient, distributing an appropriate amount of light uniformly, whilst minimising light pollution.
- 3.2 The objective of security lighting is to deter criminals by providing an environment that will deny them the opportunity of the cover of darkness and maximise the potential for them to be observed.
- 3.3 The use of lighting can greatly assist the management with wider aspects of an operation. Adjusting music volume and lighting levels can be effective in persuading customers to leave over a phased period rather than at a terminal hour where everyone leaves en masse at the same time, which can create problems for the police, local community and public transport.
- 3.4 Lighting should complement CCTV
- 4 External lighting
- 4.1 Adequate, uniform lighting should cover the entire property. The emphasis should be on installing low glare/high uniformity lighting levels in line with British Standard 5489-1 of 2013. Licensed premises with their own dedicated car parking facilities should take due regard to the lighting requirement set out in BS

5489-1.

4.2 The Colour rendering qualities of lamps used in an SBD development should achieve a minimum of at least 60Ra on the Colour Rendering Index (Note 4.2). Note 4.2: The Colour Rendering Index, scaled from 0 to 100 indicates the colour rendering qualities of lamps. 0 is a non-existent ability to render colour under illumination, such as low pressure sodium lamps (SOX) (not allowed under BS5489:2013), and 100 is the colour rendering qualities of daylight. The higher the RA the better the colour rendition qualities. Properly optically controlled white light (higher than RA60) will enable humans to see more clearly and improves facial recognition than if the light has an RA of lower than 60 such as High Pressure Sodium (SON). This is because it falls into the Mesopic range of vision and therefore the eye uses both rods and cones to determine the image. The British Standard has different levels of lighting as part of its P classes which now take into account the Mesopic properties of each type of lamp and its effect on the human eye. This is called an S/P ratio and will be an additional factor when the designer is choosing the lighting class. Please note that C classes and M classes are not affected by this and do not have the scope to lower lighting levels due to the use of white light.

4.3 The DOCO should always be provided with a 'Lux Plan' which shows both contour lines and lux points in order that the lighting system can be assessed. Additionally a risk and environmental assessment for the Construction Design Management (CDM) designer compliance requirements must be included. The plan should be compiled by a 'competent' independent designer with at least level 3 or 4 competency under the Institute of Lighting Professionals (ILP) guidance notes. The designer should be MILP and either IEng or CEng to be deemed competent to be able to design under CDM regulations. Manufacturer designed schemes without risk or environmental assessments will not be accepted as they do not cover the CDM designer risk elements which are required (Note 4.3).

Note 4.3: The details on the plan must include the maximum average, minimum and average lux levels proposed. The plan must also show the Uniformity (Uo) and colour rendering (Ra) values for the scheme.

4.4 Light pollution must be minimised (Note 4.4).

Note 4.4: All living things adjust their behaviour according to natural light. The application of artificial light has done much to improve our experience of the night-time environment, but if this light is not properly controlled both physiological and ecological problems may occur. Minimising light emitted in directions where it is neither necessary nor desirable is extremely important. Obtrusive lighting from the private elements of the scheme is deemed a statutory nuisance (public lighting is not covered) and illuminating areas unintentionally is wasteful. SBD requires that only luminaires with suitable photometry serving to reduce light spill and upward light may be used.

In terms of sustainability, consideration must be given to the consequences of turning off street lights. Such a measure may be counterproductive in terms of CO2 emissions and lead to the greater use of motor vehicles because residents are too afraid to use unlit streets. Crime levels, and in particular fear of crime levels, must also be carefully monitored to see what impact such an action has made to the community. The alternatives to switching off are Central Management Systems (CMS) which allow varying lighting levels for different times of the night and are centrally controlled by a Web based system. Also stand-alone dimming equipment can be pre-set to dim after an agreed time when most residents are asleep. Both systems are preferable to switching off. Some light sources are more controllable than others and these should be considered where possible. The most controllable light source with the correct RA is LED, it also has no UV or IR so therefore does not impact as heavily as other light sources on wildlife and birdlife.

Presence sensing should not be considered unless in bin stores or rarely used areas as it can produce nuisance switching and become a problem to residents. Varying light levels via a CMS or stand-alone system reduces CO2, energy consumption and light pollution so is preferable where cost is not prohibitive and where the Council specification allows.

Glare is also an issue and is defined by direct view of the light source. Luminaires without good optical or lens control should not be used in residential areas.

4.5 Preferred external lighting should be of a 'white light' source. Note that low

pressure sodium generates an orange glow and is not compatible with quality CCTV systems.

- 4.6 It is advised that all lighting sources should be compatible with requirements of any CCTV system installed (see Section 2, paragraph 46.8)
- 4.7 Lighting to all external doors and common entrances should be operated by photoelectric cell.
- 4.8 Ensure adequate lighting of external storage areas, such as barrel stores.
- 4.9 Where applicable, footpaths and parking areas, including bicycle and twowheeled motor vehicle parking should also be illuminated in line with the above recommendations.
- 4.10 Where there are beer gardens or external smoking areas, these should also be illuminated. Care must be taken to ensure that if such facilities are part of the licensed premises, that any surrounding homes are not inconvenienced by excessive light pollution.
- 4.11 Internal areas which should be well-lit include entrances, lobbies, reception pay points, toilets and corridors leading to toilets. Good lighting improves surveillance and assists in capturing better quality CCTV images.
- 5.0 Public Realm
- 5.1 Access Control

Communal Entrance

Any communal entrance on the ground floor that leads directly into any residential lobby of a building which provides access to a lift, stair core or cycle store is vulnerable. We recommend 'air lock' style lobbies at communal entrances to help prevent tailgating.

This could be achieved here by having two secure access controlled door-sets (LPS 1175 SR2) on the entrance, as well as to the stair core and access control system on the lift. Without these measures in place someone could tailgate a resident and then have free access to the rest of the building.

	5.2 Car park	
	Must be access controlled with suitable robust gates that are self closing and self locking. Fob controlled access is preferable without an induction loop that controls exit; the aspiration is for fob in and fob out operation.	
Environment Agency	We have assessed this application as one that falls outside our statutory remit to comment on and therefore we have no comments. We no longer provide responses on such applications due to the high volume we receive and the restricted resource we have.	
	If the site is within a Critical Drainage Area you should consult with your Lead Local Flood Authority. The EA are only statutory in sites in Flood Zone 1 where the EA have notified the LPA of an area with critical drainage problems. We have not notified any of our LPAs of areas with critical drainage problems (these are different to CDAs which are designated in your Surface Water Management Plan).	
20 th Century Society	Thank you for consulting the Twentieth Century Society on the above applications. The Society was involved in pre-application discussion with the applicants. At this time we acknowledged that whilst the current application would in some ways constitute less harm to the heritage asset than the previously approved 2010 scheme, we maintain concerns with the proposed scheme. The submitted application has been discussed by our September 2017 casework committee, and members wished to object to the proposals in their current form. Our comments relate only to the works affecting Hornsey Town Hall and its setting. Members had no comments on proposed alterations to the Broadway Annexe. Significance Hornsey Town Hall is a Grade II* listed building, designed by the architect Reginald Uren and completed in 1935. Only 5.8% of all buildings nationwide are listed at this high grade, and only a fraction of all listed buildings date from the twentieth century. This gives an indication as to the outstanding importance of this heritage asset. The quality of the interior fittings and their survival throughout are of major significance, and their retention within any proposed scheme is vital.	
	Pre-application discussion	
	We were pleased to see a number of clear improvements from the previous scheme, including the retention and repair of the council chamber fittings. The removal of the proposed balconies to the hall is also a positive	

change.

In summary, our primary comments related to the dropping of the windows to the south-east elevation of the Town Hall Square and the two extensions to the east wing. We also expressed concern about the impact of the proposed residential blocks on the town hall, the adjacent library (Grade II) and the wider conservation area. We emphasised the importance of an exhaustive building survey, given the exceptional survival of original features.

Twentieth Century Society Comment

The Donald Insall Associates Historic Buildings Report (July 2017) quantifies the harm as 'less than substantial', and concludes that this harm is outweighed by the heritage benefits. Whilst we recognise that there are a number of heritage benefits, we query the genuine heritage benefit of some of those set out in the report (p. 6-7). In some instances, we consider these contribute to the overall level of harm rather than help to outweigh it. Our position is set out in more detail below.

Town Hall square

Committee members objected to the proposed dropping of four of the six cills to the south-east elevation of the Town Hall Square. The elevations to the square are the ceremonial, public face of the hall. The fenestration is finely proportioned and carefully balanced across these frontages; to drop the cills on the south-east elevation would not only involve the loss of original fabric, but would irrevocably harm the whole composition and relationship between these key facades.

The removal of original hard landscaped access and an extension of the platform, with a new inbuilt ramp to connect both entrances are also proposed. This is to provide linked disabled access to both entrances and a terrace for outdoor seating for the proposed café, to which the new doors will give a direct entrance. The alterations to the landscaping here is also of concern due to loss of the original historic fabric, which is both integral to the design significance of the listed building and to the way the building currently sits within the square and relates directly to this context. The justification for these changes is to ensure the viability of the café and the overall scheme. Members were not persuaded that the scheme would become unviable without outdoor seating and direct access to the café from the square, given the proposed public use of the interior of much of the ground floor, and the fact that it may also be catering for hotel use. The Broadway Annexe will also provide outdoor seating for people in the immediate area who require it. Furthermore, we have seen no convincing justification as to why disabled access could not be retained as it is in this location,

and provided to the east elevation entrance through the insertion of a removable ramp which would not damage the listed fabric.

Members also noted that there was no visual or other information relating to the current areas of the building that are to be converted into this café space within the Condition Survey. It is unclear therefore what will be lost or altered in the conversion of these ground floor rooms into open plan.

Original furniture and fittings

Members required more detail with regards to some of the retained furniture and the re-use. For example, it was not clear how the rates desk will be truncated, or how the original desks will be turned into seating. It was felt that these should be retained in their original form, and that sufficient justification had not been provided as to why this was not possible. Given the proposed new use as a hotel, it was queried why the reception desks could not be found a more suitable new use within the proposed scheme. Members also deeply regretted the loss of the ticket office and noted that it had not been shown within the condition survey report, where it received only a brief mention. Whilst the need for increased access was recognised, as a major feature within the building the proposed removal was deeply regretted, and would contribute significantly to the overall level of harm.

East wing extensions

The proposed roof extension to the east wing is presented as a heritage benefit, on the grounds that it is better designed than the current temporary 1970s structure. Members disagreed with this assertion, and considered that the proposed roof extension will fundamentally compromise this fine elevation. Although the roof is currently cluttered with a poor quality, dilapidated structure, it has the benefit of being clearly subservient and temporary. This proposed replacement would be neither, but would completely transform the original stepped, layered massing of the rear on either side of the showpiece glass staircase. In our consideration, the extension here cannot be considered a heritage benefit, but quite clearly causes harm. Equally we consider that the proposed residential extension 'Block B' will cause harm to the setting of the east wing due to its sheer scale and mass, and are concerned by the loss of fabric its construction will entail. We also consider that the full impact of this block on the listed library is currently unclear, with verified views being limited, at oblique angles and with trees in full leaf. It is unquestionable that the way the listed buildings and the conservation area are visually and spatially experienced will be harmfully impacted; we are not convinced that enough information has been provided at this point to fully understand that impact. Justification – feasibility, management

There was concern that the application as it stands has not adequately shown that the long-term future of the building can be secured, and this calls into question the assertion by the applicants that the public benefit will outweigh the harm caused.

The key public benefit to significant historic buildings is usually achieved through securing their sustainable future. However, there is no information regarding feasibility for the community use or for the 'apart-hotel', and little information relating to the proposed management or operation of these spaces. We note that several local stakeholders including the Crouch End Neighbourhood Forum and the Weston and Haringey Parks Residents' Association have called for further information in this regard. The Society supports this request, to better guarantee that any harm carried out as part of these works, if they are approved, is truly justified through an established sustainable future use.

Policy

Paragraph 132 of the NPPF 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification'.

Conclusion

The Society has concerns with some details of the proposed scheme, and urges that the proposals to drop the cills, to alter hard landscaping, and to extend the east wing are reassessed. In addition, given the lack of information provided regarding the feasibility of the proposed new use, the overall argument that the scheme will outweigh the harm caused through public benefit has not been adequately made. For the above reasons, the Society wishes to object to the application in its current form, and recommends that it is withdrawn and amended, or refused.

I trust that these comments are of use to you in your consideration. Please do not hesitate to contact me if you have any further queries.