

COMMENTOR	COMMENTS
<p>Crouch End Neighbourhood Forum 19c Elder Avenue</p> <p>Neither supports nor objects (Request for Information)</p>	<p>With reference to the revisions posted August 30th, the updated Application Cover Letter, and the existing Red Line of the Site.</p> <p>A new feature, a bike store, has appeared in the small space alongside the western edge of the eastern annex (telephone exchange building). This is at the rear of no.11 Weston Park. On drawing PX352 this change is described as -</p> <p>"(6). Bike store relocated due to reconfiguration of Broadway Mews." However, this space is not identified as part of the red line of the site (drawing PX201), nor has it featured in previous plans.</p> <p>Does this represent a change in the site area? If so, further revisions to the application should be presented and drawings and descriptions updated. Or is it a separate development off site? It may be useful to have confirmed whether the ownership, permissions, or availability of this small parcel of land has been secured.</p>
<p>Crouch End Neighbourhood Forum 2a Fairfield Road London N8 9HG</p> <p>Either supports nor Objection (Response to HGY Economic Development comments - Miriam Levin)</p>	<p>This has also been sent directly to the Economic Development Team.</p> <p>I am writing on behalf of Crouch End Neighbourhood Forum in response to the Economic Development team's response to Hornsey Town Hall planning application (HGY/2017/2220). We ask that the Economic Development Team reconsider their response, taking into consideration the current use of HTH, which they seem to be unaware of when they wrote their response.</p> <p>HTH has been open as Hornsey Town Hall Arts Centre since 2015. Since then it has hosted a full programme of classes (dance, drama, yoga etc), shows, film screenings, events, etc. There is a cafe on the ground floor and innovative occasional catering events. The Ply Art Gallery operates here with a full programme of exhibitions. The Crouch End Festival has benefited enormously from the ability to circulate freely from the Town Hall Square into and around the building.</p> <p>Therefore, we seriously question the assertion: 'We understand that the former Town Hall has largely been vacant or underused in employment terms for many years.' It has been neither vacant nor under used for the past two years.</p> <p>Their response further asserts: 'The proposed development is likely to generate overall more jobs and a wider range of jobs including entry-level job particularly in the hospitality/catering sector.' A major use of the building for over 2 years is as a creative business hub, acting as an incubator for small enterprises</p>

	<p>needing space. Currently over 75 businesses employing 130 people are working out of the offices in the building. The range of businesses is wide, including creative, support, design, professional services, such as architects, jewellery makers, and designers.</p> <p>The planning application submitted by Crouch End (FEC) Ltd will result in the loss of all these small businesses from Hornsey Town Hall, with no re-provision of office space in the development. There is a small co-working area but this does not meet the needs of small businesses to work out of small, affordable offices. Given the 'somewhat limited' nature of the proposed co-working space all the current jobs would be displaced, and this employment lost to Crouch End.</p> <p>It is also our understanding that the nature of the hotel is to be on the self-catering apart-hotel model, thereby generating very few jobs. Whilst some restaurants are planned the employment these bring will likely be cancelled out by the closure of the less competitive independent restaurants on the periphery of the town centre.</p> <p>We ask that the Economic Development team takes into consideration the existing employment uses of the site and the impact of their loss on the local area and the borough. We also ask that the ED Team presses the developer to not get rid of the existing employment space, and provide replacement affordable workspace in the new development in line with Haringey Development Management Policy DM40 Non-designated employment land and floorspace.</p> <p>In light of these comments, we ask that the ED Team withdraws the comments made on the planning application, and resubmit them taking into account the current uses of the town hall.</p>
<p>Crouch End Neighbourhood Forum 02.10.2017</p>	<p>The Crouch End Neighbourhood Forum (CENF) is a statutory body concerned with neighbourhood development and planning and was designated by Haringey in December 2015. With over a thousand members including many community organisations and local businesses, and drawing upon diverse local expert opinion, CENF is committed to representing the views of the people of Crouch End.</p> <p>This project is a crucial development opportunity for Crouch End that offers a long overdue solution for the Hornsey Town Hall (HTH) site. We welcome the initiative to restore the Town Hall, upgrade the civic square, and deliver much needed housing. We support the prioritising of restoration and community use and access, and believe that a successful creative hub and arts venue would prove a well valued local facility, having considerable potential for local social and economic development and regeneration. We note that the project emerged through an OJEU procurement process designed to identify a private sector developer and to dispose of the Town Hall on a 130 year lease.</p>

However, although a strong scheme, CENF wish to object to the proposal in its current form.

In particular we cannot offer approval due to the impact upon the heritage assets and Conservation Area through increased height and massing which go beyond the previous 2010 consent. CENF also believe that additional information is necessary before approval can be offered, although we understand some concerns may be allayed prior to determination of the planning application.

The following issue requires material amendment:

- Harm to the setting of Hornsey Town Hall and Hornsey Central Library through excessive scale and massing of the residential blocks, and a failure to preserve or enhance the character and appearance of the Conservation Area

The following issues require revision or amendment before permission is granted:

- The absence of a detailed presentation of viable future uses for Hornsey Town Hall, and the sustainability of the proposals
- Loss of workspace and the change of use from B1 to C1 (HTH), and B1 to C3 (Broadway Annexe)
- Over-development and excessive density of residential development
- Harm to amenity of neighbouring residents through increased height and the positioning of the residential development
- Transport and travel planning

The sections below set out our response in more detail:

1.0 Policy and Objectives

2.0 Heritage, Development and Use of Listed Buildings

3.0 Hornsey Town Hall Restoration

4.0 Hornsey Town Hall, Hotel Use

5.0 Hornsey Town Hall, Community and Arts Use

6.0 Hornsey Town Hall, Office Use and Employment, Change of Use, Co-Working Space

7.0 Landscaping, Civic Square and Green

8.0 Impacts on Listed Buildings and Conservation Area

9.0 Housing, Density, Impact on Residential Amenity, Affordable Housing

10.0 Transport and Access

11.0 Planning Obligations, Regeneration, Community Infrastructure

12.0 Conclusion

1.0 POLICY AND OBJECTIVES

Overarching Policy Statements

London Plan policy 7.9: Heritage-led regeneration:

Strategic:

A. Regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration. This includes buildings, landscape features, views, Blue Ribbon Network and public realm.

Planning decisions:

B. The significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised both in their own right and as catalysts for regeneration. Wherever possible heritage assets (including buildings at risk) should be repaired, restored and put to a suitable and viable use that is consistent with their conservation and the establishment and maintenance of sustainable communities and economic vitality.

Haringey's Local Plan Strategic Policies (2013): Policy SP15 Culture and Leisure:

7.2.17 The Council's vision for Hornsey Town Hall, its associated buildings and surrounding area is the creation of an interesting, lively focal point for Crouch End through the creation of an integrated complex of buildings, which promote a viable and vibrant mix of community, cultural, arts, leisure, business and residential uses through appropriate refurbishment and further enabling development.

Local Plan Site Allocations DPD (2016): Site SA 48 Hornsey Town Hall:

2.136 Restoration of the existing listed buildings to create a sustainable future use for these buildings which complement Crouch End District Centre, with enabling residential development on the car parking areas.

2.137 Planning consent was granted in 2010 for a refurbishment of the existing Town Hall, with an element of enabling residential development. New uses will be considered by the Council, with the aim of finding a use that benefits the vibrancy and vitality of Crouch End District Centre. Sensitively designed residential development which appropriately enables this refurbishment will be considered.

As public land, a high bar must be set for public benefits of the scheme. Indeed, the value foregone by Haringey Council in the sale of developable land provides an effective subsidy of £millions for the project. CENF are generally content that this proposal does represent a mixed development that aspires toward the Council's vision for the Hornsey Town Hall site, and aspires toward public benefits including the restoration, community use and access, and the provision of housing. We particularly welcome the elements of increased public accessibility to the Town Hall building, and consider public access to be the bedrock of long term community use. These benefits should be secured through planning condition. Long term sustainable future uses for the building commensurate with the status of a grade II* listed heritage asset and its significance to Crouch End are key objectives. The opportunity must be taken to present a high profile scheme for the heritage spaces and to positively impact the local economy. In addition, although a balance of priorities must be found, the enabling residential development must not cause harm to the setting of the listed buildings or the Conservation Area, or neighbouring amenity.

We are somewhat puzzled that the final form of the project as presented in the planning application does not appear to conform with the scheme agreed through procurement in October 2016 or as described in the announcement of the Development Agreement contract in February 2017. The lack of transparency as the scheme has progressed through the bid process has unfortunately undermined public support for the project. We are equally surprised by the very limited presentation of the feasibility, viability or operation of the new uses for the Town Hall, particularly the arts and cultural aspect of the development – as they involve substantial material re-purposing of the fabric of the building. An assessment for Listed Building Consent depends upon this information. We also believe that elements of the scheme, principally the loss of B1 use, may damage local economic vitality.

Though not strictly a planning matter, we are also aware that there are concerns that a developer may wish to realise their investment quickly, mitigating risk through forward selling developments. Change of control clauses relating to building contracts and usage are hopefully in place. No assumptions should therefore be made regarding the completion of a restoration project, or that the suggested hotel, arts/community centre or co-working space will emerge as currently understood. Planning conditions which assist in securing these elements are warranted.

The commitment of the developer, the Far East Consortium, to a full restoration and a demonstrable long term engagement with the Town Hall, is essential to the success of the scheme and to a positive determination of the planning application.

2010 Planning Permission

We note the previous consents associated with the application HGY/2010/0500. We appreciate that the earlier permissions are material considerations, but believe they should carry limited weight, due to the time elapsed, and because the full architecture of planning policy – the National Planning Policy Framework, the London Plan, and Haringey's Local Plan – has been overhauled in the interim. The context of the 2010 consent was very different. That scheme was the result of a long process of consultation working toward a community asset transfer of the Town Hall to a charitable Trust. The enabling development was presented as the maximum achievable residential scheme necessary to support the project's charitable goals. In the light of the very different private scheme now presented, the scale and form of the 2010 blocks should not act as assumed precedent.

2.0 HERITAGE, DEVELOPMENT AND USE OF LISTED BUILDINGS

Hornsey Town Hall is a grade II* listed building of national significance. National guidance for heritage assets demand that a sustainable future is secured for Hornsey Town Hall and associated complex of listed buildings. Sections 66 and 72 of the Planning (Listed buildings and Conservation Areas) Act 1990, set out the obligations to safeguard listed buildings and the character and appearance of conservation areas. Conserving heritage assets in a manner appropriate to their significance is a core principle of the National Planning Policy Framework (2012). Although harm needs to be weighed against public benefits, we note that heritage guidance states that optimum uses are those that cause the least harm to the asset whilst offering viable use.

Local Plan policy SP12 aims to protect the status and character of the borough's conservation areas. Policy DM9 further describes the management of the historic environment: DM9/C/e sets out the desirability of viable use/s for heritage assets, and DM9/C/g the contribution it should make to providing economic benefits and local regeneration:

“Regenerating heritage assets can anchor new development, reinforce a sense of community, make an important contribution to the local economy and act as a catalyst for improvements to the wider area”. These tests are crucial in establishing the desirability of the proposed changes to the fabric of the building, and the impact of the new uses on the wider economy of Crouch End.

The restoration and refurbishment of Hornsey Town Hall, and the development of a sustainable future were the principal objectives of Haringey's procurement process. Simply removing the Town Hall from the

Historic England Buildings At Risk Register is not a sufficient objective in itself, the aim must be to reflect the prestige and potential of a grade II* listed building. We concur with the Donald Insall Associates assessment, presented by the applicant, which identifies and welcomes “broader public benefits” including public access to many hitherto closed parts of the building, and new uses which bring new life to the site. Historic England observed of the scheme (representation to Planning Sub-Committee, July 2017, our emphasis) –

“It is our view that your proposed uses for the Town Hall provide a good fit for the building and are unlikely to be contentious in heritage terms, provided that it can be shown that these uses are able to secure the repair and long term future and maintenance of the building.”

However, sustainable and viable uses are not yet substantiated for the heritage assets. For example the absence of details make it difficult to answer,–

How are the restoration and future maintenance of the significant spaces secured?

How is community access and the benefit to Crouch End ensured in the event of business failure?

Would increased retention of office space be the optimum use?

Is the mix of uses across the scheme complementary?

The viability of an arts centre or creative hub is a matter of considerable concern. CENF is unaware of any similar ventures which do not either heavily rely on public subsidy, or unalloyed commercial use, both of which seem unavailable in this instance. Further details should be submitted prior to Planning Committee deliberation.

In conclusion, as the proposals cause harm to the interior spaces and fabric of the buildings, justification for the changes is necessary and the sustainability of the proposed uses is therefore a material consideration. This appears contrary to policies 7.8 and 7.9 of the London Plan, and policies SP12, DM9 of the Haringey Local Plan.

3.0 HORNSEY TOWN HALL RESTORATION

We welcome the extensive detailing of works set out in the condition surveys and Historic Building Report. The developer has also promised a breakdown of the restoration work costs, which would be useful in the evaluation of this aspect.

Appropriate conditions should secure, through a section 106, that the restoration work is phased for completion before the delivery, marketing or occupancy of the residential development. In addition, a detailed management and maintenance plan for the listed buildings must be made available to the satisfaction of stakeholders.

The proposed works to the fabric of HTH are sensitive to the building but there are extensive changes: – in the east wing and link block interiors, on the lower ground level, in the creation of new auditoria, the construction of a new 4th floor on the east wing, and in the ‘dropping down’ of windows to ground level in the west wing. Other changes improve access and circulation within and outside the Town Hall. Therefore a degree of harm to the building exists. The changes may be justified weighed against the public benefit, however, we cannot fully determine the benefit or the sustainability of the proposed changes without further detailed information about the proposed use. We would expect that the restoration is carried out subject to conditions and the overview of Haringey’s conservation team, Historic England and the Twentieth Century Society.

A grade II* listed 20th century building with extensive surviving original interiors and fittings is of major significance. The retention and preservation of these particular features is of clear importance. We welcome the intention to repair features and fittings, to reinstate original features, such as the pendant lighting in the foyer, and glazed entrance doors to the Assembly Hall foyer, and the intention to integrate surviving joinery and timber features in the hotel rooms.

The main entrance hall, entered through bronze gates and complete with marble clad staircase, is probably the most significant heritage space in the building. Measures to animate the space and improve circulation are welcome, though the idea to use it as a coffee bar of some sort (a ‘barista’ is identified in room G40) seems less than fully formed at this stage. The space functions as the entrance to the hotel and may yet serve a more traditional role as hotel lobby and reception, a use which would complement its status as showcase for the restoration. If so, the reinstatement of the original curved reception desks (stranded on the first floor landing) may be preferred.

The exterior glazing is crucial to the building’s appearance and character. Can it be confirmed whether the windows due for double glazing are partially repaired, or entirely replaced? The minimal depth of frame may not take double glazing. Can it also be confirmed that the replacement windows will conform to the same appearance as those simply being repaired and repainted? Further conditions may be necessary to secure the quality and dimensions of those windows ‘dropped down’ to form doors in the west wing.

The specifications and delivery of the high quality materials and design of the hotel rooms as described in the applicant's Design and Access Statement should be secured through planning condition. There may also be further work necessary to identify all features of significance, such as the hidden but distinctive service runs throughout the building.

Signage (ref. Local Plan policy DM3) may well be required to advertise the hotel and arts use, in addition to that of the proposed restaurants. No information is supplied for this requirement. Permission may be applied for subsequently, but an indication of proposed signage displays on the listed buildings would be useful at this stage.

4.0 HORNSEY TOWN HALL, HOTEL USE

Hotel Design and Layout

A hotel relates well to the heritage, design, and size of Hornsey Town Hall. We also recognise and welcome that the hotel use will afford public access to a greater area of the Town Hall, and that any harmful impact is overwhelmingly confined to less significant areas of the building. The hotel should relate to Historic England guidance on the adaptation of listed buildings. In this respect it may be desirable to make greater use of the areas of heritage significance to enhance the presentation of the hotel, for example to house a more formal hotel lobby reception in the main entrance hall. This would complement the entrance hall's status as showcase for the restoration.

We believe there may be issues regarding the shared use of the entrance spaces generating possible conflicts between hotel use, office, and theatre. This includes hotel security concerns due to 'tail gating' and difficulties in distinguishing guests from office workers and theatre goers (reference Planning Inspectorate, ref: APP/V5570/W/16/3165171 EasyHotel House, 80-86 Old Street, Islington, London EC1V 9AX). This may be addressed through staffing of the hotel lobby areas.

Form of Hotel

We appreciate that the hotel business model requires flexibility at this stage, but the presentation of the hotel has had a confused gestation which has led to some unhelpful public speculation. The business model as announced at the close of the procurement process in 2016 and in January 2017 was for a four star boutique hotel of 50 guestrooms. At the public exhibitions of May and July 2017 the plans were substantially altered to present an aparthotel, featuring 67 serviced apartments. At the Development

Management Forum in July it was announced that the kitchenette facilities of the apartments were no longer present, and once again the model would be that of a standard hotel. However, the current application, and drawings, now appear to retain the kitchenettes, but contain no description or presentation of an aparthotel in the accompanying text.

To comply with Local Plan policy DM53, an aparthotel, or serviced apartments, must fulfill certain criteria to indicate a low level of permanency or would be classed C3 accommodation. Criteria may include the presence of staffing, facilities and ancillary spaces to evidence hotel use, and assurances that the guestrooms will not be marketed separately. These characteristics do not appear in the plans presented, though we understand discussions are ongoing. We would support clear assurances through condition, including specifying a maximum length of stay for guests.

We note that policy DM53 also demands that hotels be situated in an area well served by public transport. This is defined as Transport for London Passenger Transport Access Level (PTAL) 4 or above, whereas Crouch End is rated at PTAL 2-3 moderate to poor. Furthermore, the hotel should:
“Provide appropriate arrangements for pick up / drop off, service delivery vehicles and coaches, appropriate to the size of the hotel or visitor accommodation.”

However, no provision is made for hotel parking, no space for coaches, and the arrangement for a shuttle bus is unclear. This appears insufficient for the needs of the hotel. With restricted access along Hatherley Gardens and no drop off area on the Broadway, where will cars and taxis for hotel guests set down?

Hotel Viability

The success of the hotel is key to the long term sustainability of the Town Hall, and underpins the other commitments for the Town Hall project. Whilst it is evident that the formation of the hotel is situated in the areas of lesser heritage significance, the planned hotel is still an irrevocable transformation of the interior of one half of the TH building. This is a prima facie trade off between material harm to the building in exchange for viability.

This transformation is not without risk. At the moment no feasibility work or business case is publicly available which allows an assessment of this proposed use, an unproven concept. Hotels are vulnerable to market conditions, and Crouch End appears to be a less than propitious location. No one wants a white elephant. To achieve a credible determination for Listed Building Consent a clear presentation and detailed feasibility study and business plan for a hotel must be made available to the satisfaction of stakeholders,

including Historic England.

The hotel also requires planning permission for change of use. This is addressed below.

5.0 HORNSEY TOWN HALL, COMMUNITY AND ARTS USE

In addition to the restoration, the principal public benefit proposed by the applicant is community use and access. Community use will be delivered through an arts/community centre or creative hub, which occupies the key spaces of heritage significance and the public auditoria. New spaces are proposed. CENF welcome this concept and believe that a successful venue would prove to be a well valued local facility, and a significant enterprise for Crouch End having considerable potential for local social and economic development and regeneration. In addition to conditions in a section 106, community use is understood to be secured through a Community Use Agreement (CUA) attached to the lease and a community steering group formed. Community use should be assured at affordable or free rates. However, the overall vision remains indistinct. It is unclear whether the planned use of the building is an arts centre, a performance venue of some kind, a creative business hub, a community centre, or other form. It is also unclear how this use would be viable without public funding or significant and ongoing subsidy. There is a high risk of failure. It is not known how future maintenance of the significant heritage spaces, such as the auditoria, Committee Rooms and Council Chamber will be secured.

It is very difficult to evaluate design and use without evidence presented to support the siting of a complex arts/cultural facility in this location, and in a grade II* building. The business plans of the operator are not published. A vision and feasibility assessment are unavailable. The cultural mode, use, programme, etc. are absent. The operator, the form and mode of any arts use should ideally be settled now, before changes to the fabric of the building and the interior remodelling are finalised. For example, the applicant's own Design and Access Statement observes that "The scope of the refurbishment and upgrade [of the Assembly Hall stage] is dependent on the Arts Operator's use of the hall."

We draw the attention of the Planning Authority and the applicant to the list of operation and design issues for the performance spaces identified in comments by the Theatres' Trust (submitted to planning portal, ref. HGY/2017/2220). It is evident that good acoustics will be vital to the success of the venue, and we support the call for an acoustic study to determine the best approach. We also share concerns that further consideration be given to uses of the main auditoria, where travelling productions or orchestral use may require servicing by large goods vehicles or even coaches. The input of the arts operator and a credible and well founded artistic direction and programme would clearly help in this regard, and if

unavailable, an assessment should be made by appropriate professionals. A finalised set of worked-up changes to the auditoria should be submitted prior to Planning Committee deliberation.

A public announcement (22nd September, and not contained within the planning application) has identified an operator and we hope this will strengthen the presentation and afford opportunity for community consultation. We welcome the venture, and await further details regarding allocation and use of key spaces, and the breakdown of arts, community, co-working, and commercial hires.

In conclusion, to achieve a credible determination for Planning Permission and Listed Building Consent a clear presentation of use is required. In addition, a feasibility study and business case, detailing sustainability and future maintenance, must be made available to the satisfaction of stakeholders, including Historic England.

6.0 HORNSEY TOWN HALL, OFFICE USE AND EMPLOYMENT, CHANGE OF USE, COWORKING SPACE

We wish to offer support for the present business and creative hub uses of the Town Hall, particularly the importance to the local economy. The applicant proposes a more constrained B1 provision, a co-working space. This is discussed below.

Current Office Use

The office spaces contained in the administrative blocks of Hornsey Town Hall were built for purpose. Although the local authority vacated the building some time ago, during the last three years the spaces have been profitably occupied and continue to serve as B1 class use. In line with NPPF guidance if continued office use is viable and other uses would cause some harm to the heritage asset, then office use represents the optimum viable use.

The current provision (managed by ANA Arts, founded 2014) is a creative business hub and open workspace, with managed office spaces, small workshops, and creative studios. Highly flexible, it provides an ideal environment for a range of local small enterprises and start-ups, designers, small producers, tech, and professional services. Community uses are also supported, with affordable space for small studio and rehearsal use, and a gallery offering a full programme of exhibitions and a strong base of community use. The current use represents an invaluable local resource.

In the applicant's scheme, the greater part of B1 floorspace will be lost and the businesses decanted. The scarcity of alternative affordable office space in Crouch End suggest this employment will also be lost to the area. The proposed change of use is also likely to have a knock on effect in the form of reduced highstreet daytime trading across the town centre.

Local Plan policies SP8, SP9, and SP15 support the retention of current employment sites and provision of new workspaces, local employment, regeneration, SME businesses, and state,
"the Council is committed to encouraging small start-up units in new developments and supporting small and medium sized units on existing sites or in existing buildings."

Furthermore, a priority for the new Mayor is 'supporting small business and protecting business space': Our small businesses, start-ups and entrepreneurs are at the heart of our economy and our communities, and supporting them to grow, innovate and create wealth and jobs will be central to my plans. I will:

- Prevent the loss of business space, by working with local authorities to stop the excessive conversion of commercial space under permitted development rights.

- Promote the provision of small business and start-up premises in housing and commercial developments through the London Plan. (Sadiq Khan, Manifesto)

The clear direction of travel in London Plan and Local Plan policies is to support exactly the form of provision currently housed with Hornsey Town Hall. We strongly suggest that the current use is viable, valuable, and should be retained as far as practicable to provide local employment opportunities and support the local economy.

We feel that the retention of flexible workspace would be of tremendous advantage to the mix of the development as a whole, broadening uses and revenue opportunities, achieving synergies with the arts and hotel, and meeting the objective for a place-making, regenerative development benefiting the local economy. We would urge the applicant to consider such uses on site.

Employment

At this date (September 2017) there are 83 HTH tenants, businesses which employ some 125 people* – far more than the estimates for possible employment numbers contained in the applicant's presentation (*figures supplied by the current operator). Skilled jobs in growing areas of commerce, they include artists, architects, designers, jewellers, manufacturers, therapists, film makers, tech companies, marketing,

communications, and a whole range of professional services. By comparison the nature of employment in a hotel is considerably more limited in scope and often low-skilled.

The Haringey Economic Growth Strategy (2014), observes "We have been seen as a dormitory borough with insufficient focus on local job creation" and goes on to propose a future where,–

"The profile of Haringey-based jobs changes so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly skilled sectors, such as sustainable technology, digital design and skilled/craft manufacturing".
We concur with Haringey's vision, and with Local Plan policies SP8 and SP9 which seek to protect local employment and improve skills, however the HTH proposal will see key employment and skills lost to the area. We feel it is not impossible to see hotel use and the current uses co-exist in the development.

Change of Use

The application requests material change of use across significant areas of the Town Hall (principally the east wing and link block) from B1 office use to C1 hotel use.

Policy and good practice, as set out by Historic England, the NPPF, and the London Plan, require that when new uses are found for historic assets that they provide for a viable and sustainable use going forward and that impact on the significance of the asset is limited. It is evident that the current office arrangement would incur little harm to the fabric, whereas the impact of a change to hotel use is far more extensive. We note that changes of use are supported should the original or current use be declared non-viable. Local Plan policy DM40 stipulates conditions for the granting of change of use of non-designated employment land and floorspace, requiring the applicant to demonstrate that the site is no longer suitable or viable for the existing use. The policy clearly sets out the requirement for clear and robust evidence of an open and recent campaign to market the site covering a minimum continuous period of three years (also explanatory para 6.27). The policy requirements are not met in this application as no evidence for redundancy is presented.

The present usage of the east wing and link block is by scores of small businesses with a waiting list for workspaces. According to the current tenants average rates are between £20-35 psf (*figure supplied by HTH Tenants Association). This is commensurate with market rates for office space in the area. This demonstrates that B1 use is in fact viable with a strong level of demand.

The figures contained in the applicant's Economic Viability Assessment include analysis of the costs and revenue from both hotel and office use. An evaluation of business type use and a comparison between hotel and office use are therefore possible and confirm that continued B1 use is entirely viable under current market conditions. Consequently we would expect a very strong presentation from the applicant if they wished to establish that the site is no longer suitable as per existing use class and should become C1. In conclusion, although some B1 use is presented, the need for change of use is not evidenced and the existing use appears viable, of proven local demand and meets local economic need. This appears contrary to Local Plan policies SP8, SP9, SP15, DM40 and DM49. We would urge the applicant to balance proposed uses, perhaps through retention of office space in areas such as the Broadway Annexe buildings.

Additionally, Local Plan policy DM49 (Managing the Provision and Quality of Community Infrastructure) identifies that community uses should be retained, also requiring the applicant to demonstrate that the site is no longer suitable or viable for the existing use. Although performance based community uses are to be retained elsewhere in the building, a good deal of floorspace currently occupied by small community organisations in the east wing and link block is due to be lost in the conversion to hotel. We note, "The Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community."

Co-Working Space

The applicant's response to the loss of the office space is the provision of co-working hot-desk type operations located in the ground floor of the council block, the west wing first floor, the roof of the Assembly Hall and the green room. The total area designated for B1 use shrinks from a total of nearly 3000m² (of which more than 1300m² is currently available as lettable space) to 440m².

We welcome co-working but have significant doubts – anecdotally, such business ventures have proven unprofitable outside of Central London, and we are concerned that there is insufficient demand in the local economy (perhaps demand is already met by coffee shops offering wifi access?). Most importantly, the coworking proposition fails to recognise the strength of the current flexible offer, which responds directly to actual demand for small business space, workshops, and studios in Crouch End. The spaces proposed do not offer a suitable environment for many businesses who require self-contained spaces.

The scheme identifies the planned co-working spaces as part of the 'community' section of HTH and as such we would expect low affordable rates, but the applicant's Viability Assessment presents commercial rates and expectations. Which is it?

The co-working space is quoted as covering 443m². From the labels attached to rooms, this includes the ground floor 'rates office' (206m²), three 1st floor rooms (68m²), one 2nd floor space over the function room (61m² at height above 1.5m headroom). This makes a total of 335m². The missing space may be (it isn't clear) the green room and dressing rooms behind the stage in the Assembly Hall. However, if so, we strongly suggest that these spaces be re-allocated to the arts operation as necessary rehearsal, ancillary and studio space.

As mentioned above, an announcement (22nd September 2017) identified an operator, and also a digital media (hologram) production company as a key tenant. This would appear to strengthen the viability of the development and deserves support, but we ask where this operation would be sited. Would it replace spaces currently identified as co-working use or arts use? Would interior spaces be redesigned to provide suitable accommodation?

7.0 LANDSCAPING, CIVIC SQUARE AND GREEN

The civic or Town Hall square is essential to the 1930s group composition, playing a critical role in the setting of the listed buildings. It requires the same level of detailed work as the Town Hall. This is Crouch End's town square, its village green, and the future of the space is high on the list of community priorities, its redesign of significant impact on the setting of heritage assets, and its use of high place-making value. The square is the home of the Crouch End Festival. The outcome of a redesign will be a key test for the development as a whole.

The square is a valuable amenity for local residents in an area of relative open space deficiency as identified in the Local Plan. In line with Local Plan policies SP13 and DM20 we would expect the presentation of an agreed level of appropriate maintenance to "secure improvements, enhancement and management" for the green spaces and the civic square. CENF would support the designation of Local Green Space to further secure the asset.

The public realm may be suitable for the provision of public art. Directional, advertising and information signage may well be required for the hotel and/or arts venue, and for Town Hall heritage information, and should be agreed. The square is not suitable for other permanent commercial advertising.

Civic Square Form and Design

The retention of a grassed area has been a constant request in public consultation. Plans to address the neglect of the current square are welcome, and the proposed re-design of the space interesting. We note the intention to reference the original shape of the green, the retention of the fountain, and the reinstatement of original style lamps. Pedestrian movement must be taken into consideration for the location of pavement cafés and street trading.

The proposal for the square removes and replaces all existing features such as kerbs, roadways, paving stones, tree beds, benches, etc. The applicant needs to justify the loss of the original work. The replacement materials should correspond with those used by the architect in 1935, should not detract from the setting of the listed buildings, and should respond to the distinctiveness of the area in a neutral fashion.

The paved surface area will be of uniform treatment and have an emptier visual appearance than the present arrangement. Its success will depend upon the use of high quality surfaces that are visually appealing. We welcome the choice of Yorkstone slabs for this area, but request that the selection and use of materials is specified by condition and monitored prior to works and throughout the development. It is desirable to have a transect of the square made available, and further details specified including the orientation of the slabs, bonding, service ducting and drainage. Yorkstone slabs are prone to fracturing, and the thickness and durability of the slabs, information on substructure, and loading requirements should be specified. The proposed low concrete wall surrounding the new green will be a visually dominant feature and may detract from the heritage setting. Details of material and design are required. Further information should be supplied before determination, and further specifications on materials secured through condition.

Further improvements could be effected by the removal of the redundant telephone kiosks, but the applicant's demolition plan, which appears to identify the removal and replacement of the existing bus shelter, does not identify the kiosks. Can further information be supplied which more clearly sets out proposed changes?

Civic Square Use

We welcome the intention to animate the square if this can be achieved in harmony with the use of the space as public amenity and relaxation. Street trading and pavement cafés are acceptable uses, though markets should be occasional and should complement the existing town centre retail offer. Is a power supply specified? Although public access to the space appears to be agreed, what event management will

be in place?

In public consultation in 2015 and 2016, the top 3 desired uses for the square were,– arts/festival space, free public seating, and markets/fairs. These uses are also indicated by the applicant, but the new design must be tested in consultation with key stakeholders, such as the Crouch End Festival or future commercial restaurant users of the site. We are informed that discussions are now ongoing.

Events/Festivals:

A

t present the Crouch End Festival uses the tarmac area nearest the Town Hall, and the open green. Both these areas will largely disappear, leaving less useful spaces for stalls and stage (the widest space now is as the square meets Hatherley Gardens, but this is needed for drop-off). With further constraints expected by pavement cafés, cycle racks, and the barrier of the new wall, it seems unlikely that the Festival could offer the same size of event in future.

Markets:

The space indicated for this use is still unclear. The existing width of the southern Barclays-side paved space is 7m, although this contains public benches. The proposed new arrangement (minus the space occupied by cycle racks) appears to be 6m widening to 9m. Is the space available consistent with the proposed use? Further consideration of servicing for the proposed operation of the square should be presented, for example the requirements of setting up for markets and events on the square. Where would support vehicles be located?

Restaurants:

We are concerned that the plethora of food and beverage outlets and pavement cafés may combine to threaten over-development and commercialisation of the square, detracting from the setting and quality of the open space. The square already has a large café space in the western Annexe (Middeys) and the applicant proposes two extra restaurants facing the square, in the ground floor eastern Annexe and ground floor Town Hall west wing (there are also: a roof top bar, a café in the lobby, a barista in the entrance hall, and a couple of venue bars within the auditoria, bringing the total food & beverage operations to 8). All three restaurants on the square have street trading arrangements indicated. We also note that the siting of a pavement restaurant in front of the north facing west wing, a somewhat forlorn space, is not convincing.

Over-development and over-commercialisation may be mitigated by a condition restricting pavement cafés to movable street furniture and retractable awnings. A precedent for the use and development of structures on the square is a Haringey LPA decision to refuse a permanent canopy attached to the western Annexe building (ref. HGY/2017/1237, May 2017).

Noise / Hours of Operation

Local Plan policies DM1, DM8 and DM23 address issues of noise and environmental protection arising from commercial activities (and on street dining). In this instance potential conflict may arise between planned activities in the square and the proposed siting of residential development in the Annexe buildings directly overlooking the square.

The use of the square, the restaurants and bars, the movement of hotel guests, and the high volume of venue attendees, suggest that the space will be busy and noisy until late, especially at the weekends. We note that the success of these elements underpins the viability of the Town Hall. This is a town centre location. Hours of operation for the outdoor trading, A4 use, amplified music, and so forth, should be controlled (ref. policy DM8, 'limiting the hours of use through the use of planning conditions') but not without regard to the viability of events, the Festival, and trading. We note that the current use has licensing until 2am, as does the relevant clause in the Community Use Agreement attached to the lease.

The conversion of the office spaces in the Broadway Annexe to residential should not be approved without regard to the necessary uses and viability of the Town Hall building and civic square (this is discussed below). If approved, accommodation in the Annexe should not include occupation by vulnerable groups (ref. policy DM23, 'noise sensitive development away from noise pollution').

Other Open Spaces and Landscaping

We welcome the proposed new space 'Town Hall Gardens' and support the proposed arrangements, particularly evening management and control, for the space. We are keen to see a positive interaction of the Town Hall Gardens and Hornsey Central Library, and call upon stakeholders to explore possible uses of the space by library users. The management arrangements and maintenance for Town Hall Gardens should be secured through condition.

We welcome the revisions (August) that remove the 'gated' aspect of the development and secure a public route through the development from Weston Park to Haringey Park. This will improve local circulation and

access to Hornsey Central Library.

8.0 IMPACT ON LISTED BUILDINGS AND CONSERVATION AREA

The applicant proposes a new-build enabling residential development. Based upon, though materially amending, the earlier 2010 consent, this is principally comprised of two blocks of flats occupying the car parks of Town Hall and Library. The site is within the curtilage of the grade II* listed Town Hall, grade II listed Broadway Annexe, and the grade II listed Hornsey Central Library – a site which forms a campus of civic buildings of high architectural value. It is within the Crouch End Conservation Area.

We note the Council's duty to preserve the character of listed buildings under the provisions of Section 66 of the Planning (Listed Building and Conservation Areas) Act, 1990, and the role of heritage assets in the core planning principles and chapter 12 of the NPPF. We also note relevant guidance in the Mayor's SPG on housing and London Plan policies 7.4 Local Character, and 7.8 Heritage Assets, which states: "Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail."

Although harm needs to be weighed against public benefits, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.

Haringey Local Plan policy SP11 (Design) sets out the requirement for developments to, "Be of the highest standard of design that respects its local context and character and historic significance"

Local Plan policy DM1 expects new development to contribute to the distinctive character of the local area. Further, that it should relate positively to locality having regard to heights, form, scale, urban grain and rhythm, and local architectural styles. Policy DM9 requires development to conserve and enhance the significance of heritage assets and their setting; to be compatible with and complement the characteristics and significance of conservation areas; and to avoid substantial harm to listed buildings.

The applicant asserts that the new-build development causes limited harm to the Conservation Area and listed buildings, and states:

"the conservation area will remain largely unaltered, with the new buildings sitting on the fringe between the town centre and the residential areas"

We do not concur with the assertion, and view the conceptualisation of the site as ‘fringe’ as sophistry.

The site lies within the residential part of a conservation area. Haringey’s Conservation Area No.5 Conservation Area Character Appraisal (2010) presents the character of Crouch End as: “...an almost village like development nestling in the bowl between the hills rising in the north to Muswell Hill and Alexandra Palace.”

The site is described as:

“The rear of the site [HTH] is accessed from Haringey Park and fronted by the Grade II listed Hornsey Central Library, a fine modernist building. To the east of the access are smaller two storey domestic Victorian properties.”

The setting is Victorian suburb in traditional street form, largely intact. Weston Park is described as: “lined by two storey terraces with attics and semi-detached properties all of which are considered to make a positive contribution to the character and appearance of this part of the conservation area.” Hornsey Town Hall and its tower are a landmark feature of the townscape. It appears in protected views from Alexandra Park, though the significance is not solely measured along certain view corridors or linear views, but through a variety of static and dynamic visual impressions from across Crouch End. The Council’s Urban Characterisation Assessment (2015) identifies Crouch End’s neighbourhood character as follows:

“Crouch End has an urban village feel with low to midrise buildings, humanly scaled buildings centred around the heart of the neighbourhood, where Park Hill Road [sic], Crouch End Hill and Crouch End Hill meet forming a nucleus. The distinctive Broadway, an Edwardian, richly detailed shopping parade is the defining feature of the place, and is home to a number of landmarks and attractions, including, Queens Pub, Hornsey Town Hall, Hornsey Library and Kings Head Pub.”

The study does not support taller buildings in the area.

We regard the current form of the residential blocks as unacceptable with reference to national and local policies, and are out of scale and inconsistent with the morphology of Crouch End. They detract from, and fail to enhance the appearance and character of the Conservation Area.



N-S section showing Weston Park houses contrasting with Block A (applicant's DAS)

The argument deployed by the applicant in favour of such large and visually intrusive new-build blocks is one of balancing harm with the requirement for achieving economic viability across the development. This is the same argument used to justify 5 storeys and 92 units in 2010 (as opposed to 6-7 storeys and 122 units now), at a time of significantly lower house prices, and is therefore now a challengeable assertion.

Height of Blocks

The proposed Blocks A and B are 6-7 storeys in height and are defined by the Local Plan as 'taller buildings'. The site lies within the residential part of a conservation area formed of 2-3 storey Victorian and Edwardian houses. To the south and west are the listed Library of 2-3 storeys, and the Town Hall of, saving the tower, 3-4 storeys in height.

Local Plan policy DM6 requires such taller developments to be of appropriate scale responding positively to the local context. It states:

"taller buildings that project above the prevailing height of the surrounding area must be justified in urban design terms" and,

“conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that would be sensitive to taller buildings”.

With both height and massing of the blocks increased over the 2010 consented scheme, they cannot be assumed as permissible. The previously determined limit to the height of the enabling residential development is set out in the December 2004 Planning Brief, and the scheme of 2010, which expressly set 5 storeys as a maximum (a level contested at the time) after rejecting a taller scheme in pre-application. Concern over the height of Block B was registered by Haringey’s Quality Review Panel (May 2017). In the pre-application briefing to the Planning Sub-Committee (July 2017), Historic England observed that some harm to the setting of the listed building is evident from the height of the residential blocks – HE recommended that other options be explored. Significant objections to height have been received by CENF from the community, and we believe the development has not addressed feedback from local consultation (ref. policy DM1).

Height Precedent

There are fears that this development will set a new and unwelcome height precedent for Crouch End and the Conservation Area.

Along the main thoroughfares in Crouch End town centre a few 5 storey buildings have recently been consented, often with set-back 5th floors. We are unaware of any consented scheme in the Conservation Area of above 5 stories since the designation of the area. We note in this regard two related planning decisions,–

1. During the HTH bidding process (2015-16) a number of schemes were presented to the LPA’s Pre-Application Planning Advice Service. One scheme, of 6 storeys (ref. PRE/2016/0121, March 2016), was deemed unacceptable with reference to the 2010 consent.

2. A Planning application for an additional fifth floor on 2-4 The Broadway N8 9SN adjacent to the HTH site (ref. HGY/2013/1282, November 2016) was refused "...deemed unacceptable as it would increase the disparity between storey heights of the adjacent two and three-storey buildings" and "Overall, the proposal is judged to be harmful to the conservation area and the setting of the adjacent listed building”.

Impact of Design and Layout

The design of the blocks is well detailed, and we welcome the increased use of brick and the detailed metalwork on façades. However they remain generic in form and, due to their scale rather than exterior treatment, are at odds with the prevailing character of the Conservation Area. The quality and durability of materials, including cladding, should be secured by condition.

The high density of the residential development threatens to overcrowd, overshadow and dominate the heritage assets, which experience harm through the scale and bulk of the new blocks. We are concerned with the form of Block B. This block physically adjoins the east wing of the Town Hall, and is sited within metres of the Library. The junction between Block B and the east wing cannot be seen in the applicant's presentation, and it is difficult to read how details of fenestration and difference in floor levels are articulated visually. We strongly disagree that the rear elevations of the Town Hall have little architectural merit, as they present a considered symmetry balancing the important projecting east wing glazed stairwell (as in image below).



HTH east wing rear elevation

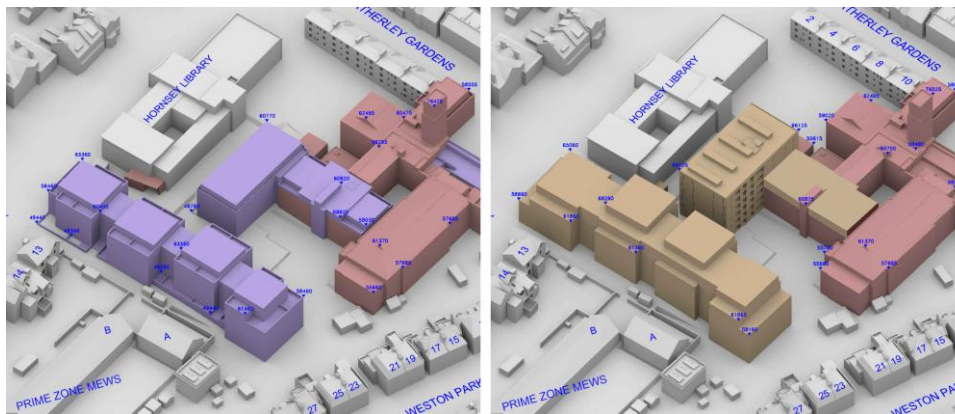
In conclusion, the proposed scale and massing of the residential blocks detract from the setting of the adjacent Hornsey Town Hall and Hornsey Central Library, and fail to preserve or enhance the character and appearance of the Conservation Area. This appears contrary to policies 7.4 and 7.8 of the London Plan 2016, and policies SP11, SP12, DM1 and DM9 of the Haringey Local Plan.

9.0 HOUSING, DENSITY, IMPACT ON RESIDENTIAL AMENITY, AFFORDABLE HOUSING

We welcome the initiative to deliver much needed housing in the local area, though have concerns over the density and layout of the scheme, and a possible low number of affordable units in the project. CENF believe the new-build development has good potential for 'downsizer' town centre accommodation.

Density and Layout

The proposed development in the car park comprising Block A and Block B represent a considerable and material increase in scale from the 2010 consent. The applicant makes extensive reference to the earlier project, and indeed the arrangement and form of the present scheme owes much to 2010. However, as can be seen in the images below, the bulk, massing and height of the principal blocks has increased substantially, with a 33% increase in residential units.



2010 scheme contrasted with 2017 scheme (applicant's 3D modelling, cropped)

Local Plan policies DM1 and DM2 require high standards of design. The consequence of the proposal's intensification of residential development is a masterplan which appears to underprovide necessary space. The development will be dense, the space between blocks more cramped than 2010, and the needs of residents may compete with vehicular servicing. The amenity space available to residents is somewhat limited, and the layout appears to produce overshadowing and overlooking within the site.

Local Plan policies SP2 and DM11 require compliance with Mayoral density guidance. The applicant has

calculated the density of the development as 162 units per hectare, however this calculation includes the civic square as developable land, which runs counter to common sense and accepted practice, as the square is an open public space and cannot be assumed as developmental amenity. A more illuminating calculation, designed to aid comprehension of the density of the residential development, would limit itself to the car park site at the rear of the TH. Using a figure of 0.65 hectares, this shows a density of 188 units per hectare. The Mayor's housing SPG sets out density guidance for urban locations in PTAL areas scoring 2-3, and determines a range between 45 and 175 units per hectare as acceptable. The HTH proposals breach this guidance.

The density of the development is reflected in the unit mix which presents a high concentration of one and two bed units, forming 93% of dwellings. The majority of units also appear to be single aspect (contradicting the applicant's Planning Statement which claims all new-build flats are dual aspect) which is contrary to guidelines set out in the Mayor's Housing SPG.

In conclusion, the quantum of development threatens excessive density and over-development. This appears contrary to policies 3.4, 3.5 and 3.8 of the London Plan, the Mayor's Housing SPG, and policies SP2, SP11, DM1, DM11 and DM12 of the Haringey Local Plan.

Impact on Neighbouring Residential Amenity

We welcome the revised reports on privacy, overlooking and daylight and sunlight. It is of obvious concern. CENF has received representations from residents neighbouring the site who cite material objections of overshadowing, overlooking, loss of privacy, loss of light and loss of outlook, out-of-character development, and oppressive development. The project affects properties in Primezone Mews, Haringey Park, Weston Park (also affected by the Mews block), and Hatherley Gardens.

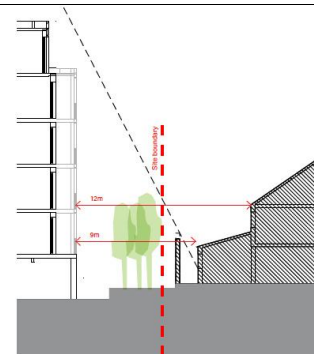
We fear that the residential amenity of neighbouring properties is adversely affected by the proposed development. It is particularly evident in comparison to the 2010 consent that the massing and positioning of Block A close to the boundary of the site stands to increase the detrimental affect of the neighbours. The block will loom over adjoining properties, and we note that neighbouring residents may require something more than screening by seasonal tree cover to mitigate overlooking and loss of privacy. Loss of light may require financial redress.



Consented scheme South elevation



Proposed scheme South elevation



Contrast between 2010 and 2017, south elevation presented to Primezone Mews (applicant's statement)
We are aware of challenges to the applicant's Sunlight and Daylight Assessment, and would urge the Planning Authority to consider further independent analysis to evaluate the extent of deviation from BRE guidance and whether the impacts are "minor in nature and acceptable".

The design and layout of the residential blocks should be carefully assessed against the 2010 consent. Any adverse impact to the residential amenity of neighbours is contrary to London Plan policy 7.6, the Mayor's Housing SPG, and Haringey Local Plan policies DM1, DM2 and DM6.

Development of Broadway Annexe

The applicant proposes the redevelopment of the upper floors of both the western and eastern sections of the Broadway Annexe to residential space, however, while the conversion of B1 office land to residential is normally a permitted development, we believe this does not extend to listed buildings, as Listed Building Consent is still required.

The Broadway Annexe is listed grade II, and change must be justified and balanced against harm caused to the fabric of the buildings. Policy and good practice, as set out by Historic England, the NPPF, and the London Plan, require that when new uses are found for historic assets that they provide for a viable and sustainable use going forward and that impact on the significance of the asset is limited. Changes of use are supported "should the original or current use be declared non-viable."

The retention and development of the current Annexe office class use would clearly meet London Plan and council policy on employment and the local economy, would better complement the overall development

mix across the site, enhance the Crouch End town centre, and would obviate the need to shoehorn coworking space into the HTH building. As suggested in the section above on employment, there is demonstrable local demand for office space.

In addition, we perceive a problem in a conversion to residential which would likely give rise to disputes over noise and the hours of operation of the square and Town Hall. The proposed Annexe flats directly overlook what will become a very busy space, with events, music, fairs, and markets, with new restaurants, pavement cafés, and roof top bar, in addition to the extra movement of hotel guests, vehicle drop-offs, and high volume events in the venue. The activity may not subside until the early hours. The Annexe is particularly unsuited as residential accommodation for vulnerable groups (ref. policy DM23). CENF object to the change of use from office to residential of the Broadway Annexe spaces. Ref. Local Plan policies SP8, SP15 and DM23.

Mews Block

The Mews block was part of the 2010 scheme. However the present design appears to increase the massing to accommodate the 9 proposed flats (rather than the 4 units of 2010). The applicant has recently (August 2017) revised the design of the Mews block to mitigate overlooking, but the bulk and form of the structure still represents significant overbearing and overshadowing – particularly for the residents at nos. 5, 7, and 9, Weston Park. We understand the motivation for the change, though the rear elevation is now formed of blank brick walls, a rather grim prospect for the neighbours, and has removed much of the potential for dual aspect for the new flats, which is recommended in London Plan guidance.

Affordable Housing

The development must conform with the requirements for affordable housing provision as set out in the London Plan and Local Plan, subject to an assessment of economic viability. The 2010 consented scheme featured 4 units of affordable housing (although we appreciate the 2010 scheme identified affordable without achieving viability). Nevertheless, since that date the value of property has risen sharply, outstripping the rise in construction costs. As this scheme proposes an uplift in the number of residential units, we see little reason why the applicant would not be able to deliver a greater rate than the original very low 3.25% affordable.

As this response was compiled, the applicant's Economic Viability Assessment proposed a zero contribution to affordable housing. We are aware that this figure may be revised by the Planning Service's

independent consultants, but are surprised at this initial calculation. The viability assessment, as supplied, relies upon challengeable inputs including low price valuations and unconvincing construction and financing costs. The proposed profit margin of 19-20% is unacceptably high for a publicly owned site. We trust the council will offer a robust challenge and expect an upward revision to the amount of affordable housing.

10.0 TRANSPORT AND ACCESS

We note the extensive transport assessment, and welcome the commitment to cycling and electric vehicles. However the presentation of the travel plan is not convincing.

Local Plan policy DM31 requires that high trip generating developments should be located in areas with high Transport for London (TfL) Passenger Transport Access Level (PTAL) ratings. However the PTAL score for the site is 2-3, a moderate to poor rating.

[NB. We note the limitations to PTAL use, for instance it does not make any calculation for evening accessibility (an important issue in a development of performance spaces, restaurants, and a hotel), nor does it account for direction of travel (eg. Crouch Hill station is of little use to the vast majority of travelers)]

The transport assessment has caused incredulity among many local people, who believe that a mixed development of this size, with auditoria, events, hotel, restaurants and a residential development of 146 units will have an adverse impact on local traffic levels, and that the proposed parking allocation, drop-off arrangements, and plans for servicing are insufficient. The main access is from Haringey Park, a residential street. The increase in use over 2010, including the marked increase in residential units and the new 67 room hotel, may generate an unacceptable level of traffic at this location. It may be necessary to apply an obligation to improve footways and highway under a section 278 agreement.

As mentioned earlier, Local Plan policy DM53 sets out a number of tests for hotel uses to be acceptable including to,

“Provide appropriate arrangements for pick up / drop off, service delivery vehicles and coaches, appropriate to the size of the hotel or visitor accommodation.”

Furthermore, policy DM32 states,

“residential developments without car parking provision are only likely to be viable where there are alternative and accessible means of transport available, in particular a good level of public transport accessibility (PTAL rating of 4 or above)”.

It may therefore be necessary to revisit the allocation of parking spaces for the residential and hotel development, to achieve a workable balance.

Public Transport

Given the limitations of PTAL analysis and addressing the reality of the location, the primary impact of residents, hotel guests, and event goers will be upon bus services, in particular the W7 route. We note that Transport for London have stated that the W7 is currently at capacity (comments received on Planning Portal) and seek funding to address the increased demand.

The Travel Plan submitted contains targets for the use of nearby underground and rail stations which are nonsensical for an assessment of the impact on Crouch End. For instance modes of travel at event attendance are identified as –

57% arriving by tube, 8% rail, 18% bus, 10% car/taxi, 7% foot/bicycle

Furthermore, 36.5% of hotel guests are expected to arrive by tube. But no tube station is within a mile of the site. We appreciate that impacts upon nearby Underground stations do require assessment, but the targets set out in the travel plan should be replaced using a realistic model of modes of travel without tube services.

As mitigation, the applicant proposes a shuttle bus, but is it for hotel use or events, and do either actually require such a service? The operation and calling points are unclear, and the impact on the Broadway bus stop, or Hatherley Gardens, or the fountain turning circle, should be determined. We concur with the proposition that the fountain circle would not be appropriate for any significant vehicular use. A clearer drop-off/pick-up zone that caters for taxi cabs would perhaps be of greater utility.

We would support a contribution toward the improvement of public transport services. We also perceive a need for a fresh look at drop-offs, bus stops, taxi ranks, and public transport movement across the town centre, in the light of recent TfL streetscape design guidance. Further consultation on transport planning should take place between developer, Haringey Council, TfL, and community groups.

Vehicle Movement and Servicing

The Deliveries and Servicing Management Plan responds to Local Plan policies which require appropriate servicing arrangements. We note the measures proposed to manage this access (providing maps, timed

deliveries, etc.), and would support ongoing traffic management.

We have concern about the level and safety of vehicular access. We note that the access road running through the site is shared by hotel, arts venue, and residential development. In addition to car use, a total of 54 daily service and refuse vehicles are referred to, all using a small service area capable of allowing one vehicle at a time. It is not impossible to imagine a scenario where the service bay is occupied by a large vehicle servicing the Assembly Hall, with other vehicles unable to enter, including fire and emergency services. Is this a credible arrangement?

As referred to earlier we share concerns that insufficient consideration is given to uses of the main auditoria, where travelling productions or orchestral use may require servicing by large goods vehicles or even coaches, or the requirements of film shoots which require extensive space for vehicles. The input of the arts operator and a credible and well founded artistic direction and programme would clearly help in this regard.

There also appears to be little consideration of servicing for the proposed operation of the square, for example the requirements of setting up for markets and events on the square. Where would support vehicles be parked?

In conclusion, further feasibility work on transport and travel planning is necessary to safeguard the amenity of the neighbourhood and highways safety, this to comply with policy 6.3 of the London Plan, and policies SP1, SP7, DM2, DM31, DM32, DM33 and DM53 of the Haringey Local Plan.

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11.0 PLANNING OBLIGATIONS, REGENERATION, COMMUNITY INFRASTRUCTURE

The principal public benefits are the restoration and continuing community use and access. However the scheme is also required to conform with Haringey planning obligations to achieve approval. These include further areas of community benefit, –

- the provision of affordable housing (discussed above)
- the provision of social and community infrastructure improvements
- a regenerative effect on employment and the local economy

Social and Community Facilities

It is of notable concern to residents that local services and facilities are currently overstretched. Doctors' surgeries, school places, nurseries, public transport, and so forth, are often oversubscribed. We note that this development is likely to provide a significant amount of Community Infrastructure Levy (CIL) contribution, over £3m. However, Haringey Council's Regulation 123 list identifies no provision of new infrastructure in Crouch End (or across the west of the borough), therefore the CIL contribution will not be available to mitigate the effects of the scheme and will not provide for any local infrastructure improvements, running counter to the clear objective of government policy. A scant 15% of CIL may be earmarked for local spending, but this is not yet allocated.

In the light of the impact of hundreds of new residents, hotel guests and concert goers in a small central area of Crouch End, we suggest that Haringey's policy is unsustainable. If local services are stretched to breaking point and CIL funds remain unavailable, large developments in Crouch End should be refused. We support calls for infrastructure planning in Crouch End and request a clear assessment of the impact of an extra 495 residents (with perhaps 200 extra children) in this town centre location.

Hornsey Central Library

The side-benefits of the scheme for the Library are alluded to in the applicant's presentation, and in previous Council announcements about spending £1m on improvements. The Library is not within the red line of site (though its car park is), but clearly should receive careful consideration as part of a wider social and cultural complex of buildings, in line with its history and continuing use and value to Crouch End. We would like to see a proposal that identifies improvements to the Library, perhaps to accommodate small businesses displaced from the Town Hall and/or as a complement to the community and arts provision planned for the HTH auditoria.

We would request a commitment by the Council and the developer to secure funding for library improvements (ref. policy DM48, planning obligations).

Regeneration, Town Centre, and Local Economy

Hornsey Town Hall is a major project, a mixed development in a crucial central location within Crouch End's town centre. Key policy aspirations include the promotion of place-making and the regenerative effect of the development – as detailed above. Local Plan policies SP12 and DM9 demand that the development of "the historic environment should be used as the basis for heritage-led regeneration", supporting and enhancing the town centre and local economy.

We welcome the proposed mix of businesses, if sustainable, and support the intention to breath new life into the site. A viable and profitable development will enhance the town centre. Our reservation is that the loss of the greater part of provision for small and creative local businesses will damage the overall offer to the local economy. This is a key area of local demand and we feel that such use would be of tremendous advantage to the mix of the development as a whole, broadening uses and revenue opportunities, and meeting the objective for a regenerative development benefiting the local economy. We would urge the applicant to consider such uses on site.

CENF are keen to see secured the long term commitment of both developer and arts operator to the project. Principal operators should have an obligation to engage with the local community, and we note the proposed community steering group in this regard.

The various elements of the scheme should complement one another and combine to present a clear and distinctive identity for the development, attractive to local residents and visitors from across London. Once again, we reiterate that further evidence be supplied that demonstrates that the new uses are viable and sustainable.

12.0 CONCLUSION

Whilst objecting to this application, the Crouch End Neighbourhood Forum support the ambition to restore, re-purpose, and develop Hornsey Town Hall and the wider site. The creation of a mixed development balanced by an enabling residential development, and the prioritising of restoration and community use and access are acknowledged. We welcome the recent announcement of operator and await further details about the Town Hall arts, community and business spaces. A sustainable creative hub and arts venue would prove to be a well valued local facility, having potential for local social and economic development and regeneration.

CENF await details on affordable housing, ongoing community use, clarity on travel and servicing plans, and appropriate planning obligations and conditions.

With revision and material amendments to,–

- mitigate over-development and the impact on the heritage assets and Conservation Area,
 - secure the restoration and the viability of planned uses of the Town Hall building,
 - address the loss of B1 space and improve the offer for local creative businesses,
- a subsequent application should find greater acceptance and support.

Crouch End Neighbourhood Forum	<p>Thank you for alerting us to further revisions made to the above scheme.</p> <p>Crouch End Neighbourhood Forum (CENF) welcomes the response of the applicant to suggestions and objections made by statutory bodies and other stakeholders, though clearly the most recent amendments are minor and do not change the overall conclusion set out in our earlier submission on 2 nd October. This was to object to the application.</p> <p>Although the applicant's responsiveness is welcome, the details of the planning application seem almost a work-in-progress rather than something settled. In addition, the now very long list of documents attached to the planning application has led to a number of people expressing complete bewilderment. Can we urge both applicant and planning authority that as this is a complex large scale major development, if you need more time, take it?</p> <p>Our principal objection to the scheme, which we felt required material amendment, is not fully addressed in the revisions, particularly in respect of the Conservation Area and the unchanged height and bulk of Block A. This was,–</p> <p>“Harm to the setting of Hornsey Town Hall and Hornsey Central Library through excessive scale and massing of the residential blocks, and a failure to preserve or enhance the character and appearance of the Conservation Area”</p> <p>Our earlier comments concluded with two further observations, that revisions which,–</p> <p>“secure the restoration and the viability of planned uses of the Town Hall building”, and “address the loss of B1 space and improve the offer for local creative businesses” – would secure greater acceptance and support for the application. In these regards a few improvements are apparent in the planning application, although the arts operator has hinted at further changes.</p> <p>CENF believes that the many objections to the application, totalling over 500 across the linked applications, are also unaffected by the recent revisions to the scheme, and should continue to be considered as valid.</p> <p>Context</p>

CENF is keenly aware of the high level of public interest in this development. Consequently it may be useful to place in perspective the significant aspects of the project.

The Town Hall is an at-risk grade II* listed heritage asset, the most important building in Crouch End. According to Historic England there are 377,587 listed buildings in England, of which just 5.8% are at grade II*. It is one of just three in the local area (the others being Hornsey Church Tower and the Queens public house). In addition, the location of the site, and certainly the civic square, are of very high value to the community and the town centre. Hornsey Town Hall is therefore both nationally and locally an important building of more than special interest, and a scheme to restore and re-purpose the building is of the highest significance.

In contrast, though clearly still of importance to Crouch End, the residential development is of lesser significance, and is simply an enabling development. The proposed 146 flats is a similar number to the 136 dwellings recently delivered at nearby Roden Court on Hornsey Lane, and are minor in scale compared to the 1,060 new units along Hornsey High Street (at New River Village and Smithfield Square), and the huge developments in the offing in the East of the Borough.

“Sensitively designed residential development which appropriately enables this refurbishment will be considered.” (Site Allocations DPD (2016): Site SA 48 Hornsey Town Hall: 2.137)

Scheme revisions

We would like to make the following comments on information recently made available.

Restoration costs and phasing

Headline restoration figures were released on October 17th. The report is welcome, though the amounts earmarked for general essential works are difficult to separate from refurbishment for new uses. Obviously some form of oversight of the project is necessary, and we also await details of planning conditions that will determine a phased development which safeguards a fully realised restoration project. The provision for, and delivery of the restoration is of key importance.

Arts and community use

Following the announcement of the arts operator, meetings have now taken place and some information regarding the arts, community and business uses of the Town Hall made available to the community. CENF particularly welcomes the outlines of workspace uses of the Town Hall. The future of B1 use for small businesses and creative industries was a key concern. We note that the operator and architect have suggested that further design changes to the Town Hall interior may be made to reflect the operator's workspace requirements. If extra space can be designated, all the better. It would be useful to see new designs at the earliest opportunity, as any changes would have to be presented for Listed Building Consent.

Heights

The height of Block B has been reduced (by some 15cm or so per floor) apparently in response to comments made by Historic England. No adjustment has been made to the height of Block A. The revisions do not alter our stated position which is set out in our previous submission. Although a balance of priorities must be found, the enabling residential development should not cause harm to the setting of the listed buildings or the Conservation Area, or neighbouring amenity. It would be simply inconsistent of us, and the planning authority, not to oppose the proposed height of the enabling development.

Affordable housing provision

The applicant has proposed that 11 affordable units are located in the upper floors of Broadway Annexe West. This was confirmed in a statement by the Assistant Director of Planning setting out that Haringey Council will be underwriting this commitment. We note that such an announcement made in advance of the findings of the authority's independent advisor's evaluation of the applicant's viability assessment is somewhat unusual, and alas has seemingly engendered further popular suspicion. However, of course affordable units are very welcome, more so that the 11 units appear to be set as a minimum for the scheme. It may well be possible to achieve more. Some reservations have been raised over the location as the upper floors of Broadway Annexe are single aspect to a noisy busy space and adjoin a venue with a potential 1,400 capacity and a 2 a.m. licence. The affordable units could, of course, go elsewhere on site. A mode of intermediate or social rents rather than shared ownership is preferred. We await the findings of the independent evaluation of project viability and proposed planning obligation for affordable units.

Design of civic square

	<p>We welcome recent collaboration with community groups, the efforts of the architects to respond to comments, and the recognition of the significance of the space to the community. A fuller presentation of issues regarding the square is available in our previous submission.</p> <p>CENF remains of the view that we object to aspects of the development. However we absolutely share the wish to see a development which secures a restoration, community access, and viable uses for Hornsey Town Hall, and this is a crucial opportunity for Crouch End to see that long overdue solution. We await further amendments to address our concerns and hope that additional design revisions and full details of proposed planning conditions will be made available well in advance of any submission to the planning committee.</p>
Hornsey Historical Society	<p>This is the Hornsey Historical Society's response to the proposals for Hornsey Town Hall submitted as an application for planning permission under the reference HGY/2017/2220.</p> <p>The Society is a registered charity whose main objective is the study of the history of the ancient parish of Hornsey and its development. As a historical society we are concerned with any proposals which affect buildings which are on the statutory list as being of architectural or historic interest. We are therefore extremely interested in the proposals for the Hornsey Town Hall which is listed Grade II*. We are also interested in the appearance and character and future of the Conservation Areas within Hornsey.</p> <p>We welcome the proposals to preserve and restore the Town Hall and to use the indicated areas for community use. However we have strong reservations about the scale and siting of the enabling development. Our objections concerning the proposed new housing are on the overall scale, massing, relationship with existing buildings and effect on residents, and its detailed planning and design.</p> <p>We consider the drawings as submitted with the planning application to be inadequate for a full planning permission. There are no full plans of the proposed residential blocks A and B and although details of individual flats are submitted, the only plans of the whole buildings are a small scale almost diagrammatic plan of the whole site. Similarly the only elevations submitted are those included in the series of sections of the site which include the existing building. From the plans on the website these appear to be drawn to the scale of 1:200 at A1. We would have expected more detailed plans and elevations to be submitted for a major development of this kind.</p> <p>We regard the two residential blocks A & B as being unacceptable in that they are too massive and completely out of scale with the urban fabric of Crouch End and with the Town Hall itself. They will have a detrimental effect on the appearance and character of the Conservation Area, Town Hall and Library, and be an unfortunate visual intrusion over a large part of the</p>

	<p>area. The space between the buildings will be unattractive and will produce unsatisfactory living conditions due to the excessive concentration of a large number of dwellings with the attendant movement of vehicles and people. The two blocks A & B will seriously overshadow each other at certain times of the day. Block A is considerably higher than the scheme previously approved and by ignoring normal daylighting standards on the boundary will, apart from appearing completely inappropriate in its context, permanently blight the land to the east and prevent any long term more sympathetic development of the area. Block B looms over the library in Haringey Park and seriously detracts from the setting of this listed building. The lower floor flats facing the narrow chasm between Block B and Library will be severely blighted by lack of sunlight and prospect.</p> <p>We note that most of the flats are single aspect only which, with such a congested development as this, could lead to unsatisfactory conditions with respect to orientation and ventilation. Many flats have areas which have poor natural lighting. With access to flats at lower ground floor, Block B exceeds the maximum number of floors satisfactory for a single lift, which should be limited to six. We also regard the proposed design of the Mews block to be unacceptable. The houses in Weston Park situated to the north of this will have a three storey blank brick façade immediately at the end of their gardens which will severely deprive them of sunlight. The natural lighting of the bedrooms to the two central flats at ground floor level is severely compromised by the storey-height wall almost immediately adjacent to the windows. All flats in this block are single aspect facing south with no apparent provision to prevent serious risk of overheating from sola gain.</p> <p>One proposal which has not been made very clear in the submitted drawings is the proposal to extend the existing Town Hall building at second floor level. Now that it is no longer proposed to use part of the Town Hall for normal residential development, we consider that there is no justification for this proposal. Although the rear elevation will be affected by the attaching of Block B the opportunity should be taken to remove the prefabricated building and restore the original appearance and integrity of the rear of the building.</p> <p>We note that the Weston and Haringey Parks Residents' Association has also made an objection to the proposals dated 21 August 2017 and we would like it to be noted that we entirely endorse all further matters noted in this objection. We have seen no response to the proposal from the 20th Century Society in respect of listed building consent, and we note that the response from Heritage England, which is listed first on the Online Planning Services list of attachments, relates to Application No HGY/2017/2221 and not to Application No HGY/2017/2220. It would appear that their response to the latter application has yet to be received.</p>
Weston and Haringey Park	Following the planning submission for the above site, we are writing to ask you to refuse permission.

<p>Residents Association</p> <p>(including the following people:</p> <ul style="list-style-type: none"> • Ruth Selig and Stephen Richter 53 Weston Park N8 • Caroline Clayton and Mike Clowes 55 Weston Park N8 • Fitzroy and Joan Thomas 59 Weston Park N8 • Iain Lanyon and Sharon Kean 10 Sandringham Gardens N8 • Andrew Zweck 14 Haringey Park N8 • Kathy Smith 23 	<p>Whilst we are in favour of restoring the Town Hall, we believe that the development proposal needs to be looked at in more depth in relation to its site, its environment, and lack of social housing. It then becomes apparent that it is not a good design for this location. We ask the council to refuse planning permission for the scheme for the following reasons (in summary, expanded below):</p> <ol style="list-style-type: none"> 1. Inadequate and incorrect information 2. Height in relation to the neighbourhood; Urban Context 3. Effect on Listed buildings and Conservation areas 4. Massing, Footprint and Daylight 5. Density and Lack of Amenity Space 6. Lack of social housing 7. Transport, Parking and Vehicle Movement 8. Deficiencies in Social Facilities and Infrastructure 9. Reduction of office space <hr/> <p>1. Inadequate and incorrect information supplied at pre-application residents meetings and with planning application.</p> <p>VIEWS: We are unsatisfied with the photomontage views submitted with the Town Hall application. These views show trees in full leaf. In addition, the plans show trees as having been removed on the corner of the library (adjoining the access), yet the photomontage has retained these and used them to block the view to the new building (block A). The submission shows views from Alexandra Palace and Parkland Walk of such poor resolution that we cannot enlarge these.</p> <p>We need to see</p> <ol style="list-style-type: none"> 1. Views without the trees in leaf, ie a winter view or trees dotted on (which is preferable). 2. Views from different angles (where they are not blocked by trees) 3. More views from Haringey Park, looking back towards block A. 4. Views from Primezone Mews 5. View from library to block A (without the tree in place). 6. Views of better resolution from Alexandra Palace and Parkland Walk <p>APART HOTEL: The drawings show hotel rooms with kitchenettes – clearly apart hotel rooms. Yet the HORNSEY TOWN HALL PLANNING STATEMENT (July 2017) refers to a Hotel. Which is the correct proposal?</p> <p>We ask the planners to write to us directly as soon as this further information has been supplied.</p> <ol style="list-style-type: none"> 2. Height in relation to the neighbourhood; Urban Context
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<p>Primezone Mews N8</p>	<p>The proposed new buildings are much too high, bearing no relation to the surrounding conservation area. HORNSEY TOWN HALL PLANNING STATEMENT (July 2017) (HTHPS) 2.25 states that: “Weston Park runs along the north of the site and comprises residential properties that back on to the application site. The buildings range between 3 and 4 storeys and are predominantly brick built.” This is incorrect.</p> <p>Haringey’s Conservation Area No.5 Conservation Area Character Appraisal (7.4) says Weston Park is: “lined by two storey terraces with attics and semi-detached properties all of which are considered to make a positive contribution to the character and appearance of this part of the conservation area.”</p> <p>It goes on to say (7.7) that houses on Weston Park:</p> <p>“...give the appearance of large semi-detached properties but are linked by set back side extensions. They have steep, hipped, slate roofs and include a mix of single-fronted and double-fronted street elevations.”</p> <p>Haringey Park, also adjoining the site, is made up essentially of two storey semi-detached dwellings described in Haringey’s Conservation Area No.5 Conservation Area Character Appraisal as “Victorian Villas” (6.6 to 6.10). The four storey Mansion block flats on Haringey Park, are not typical of the area and these are further away from the development site.</p> <p>Adjoining the site is the Library which currently sits in an open area. Haringey’s Conservation Area No.5 Conservation Area Character Appraisal (2.4) discusses the character of Crouch End as: “...an almost village like development nestling in the bowl between the hills rising in the north to Muswell Hill and Alexandra Palace.”</p> <p>HTHPS makes reference to the following policies in its submission:</p> <p>7.86 states that: The Mayor’s Housing SPG advises that, through scale, material, massing and building type, development should take account of the existing character and urban grain of a place and build on its positive elements (para 2.2.3). 7.87 Strategic policy SP11 requires all development to respect their local context and character, creating and enhancing the Borough’s sense of place and identity. 7.88 Draft Development Management Policy DM1 states that development proposals should relate positively to their locality, having regard to form, scale and massing prevailing around the site. 7.89 Draft Development Management Policy DM6 expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieving a high standard of design.</p> <p>However, analysis of the above Mayoral, London and Local policies, together with the findings in Haringey’s Conservation Area Character Appraisal, shows clearly that the proposed construction of blocks A and B, with heights of 5, 6 and 7 storeys,</p>
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is an inappropriate development in this Conservation area where the majority of buildings are dwellings of 2 storeys, and where Crouch End has been described as having a “Village” feel. Furthermore, in the detailed design of the proposed development there is insufficient modulation both in the roofline and frontages to reflect the architectural rhythm of the surrounding area. The proposed buildings appear to have more in keeping with the new developments at Kings Cross than in this Victorian London Suburb.

3. Effect on Listed buildings and Conservation areas

HTHPS Assessment 7.91 “The massing of the proposed blocks has been established through rigorously testing the potential impact of increased massing on the setting of the Town Hall and Hornsey Library, the wider Conservation Area, the impact on neighbouring amenity and the impact on local and strategic views.”

We disagree with claims in HTHPS (4.5) that concerns have been addressed. The heights, proximity, massing and detailed design of Blocks A and B have a detrimental impact on the setting of the existing Town Hall, Library and surrounding streets both in its setting, space around it and competing heights. The unmodulated facades of the new apartments, (save for the recessed balconies), bear no relation to the detailed nature of surrounding residential streets. Whilst HTHPS asserts that the details used in the Town Hall and Library have been referenced (balconies, colour, metalwork) the boxy flat fronted nature of the blocks competes with the clear lines of the modernist town hall.

The Town Hall, as a civic building of tremendous architectural importance, needs breathing space around it, both on plan and elevation. Site sections (Section KK drawing PX2253 and section FF on PX2252) clearly illustrate the bulky, overbearing nature of the proposed buildings, in the context of the Town Hall. It is not just key views from surrounding streets that are important - buildings are not simply viewed from a static vantage point, but are walked around and moved through. This development, at such a scale and massing detracts from that of the Town Hall and Library, and the genius loci of Crouch End.

4. Massing, Footprint & Daylight

The new buildings occupy too much of the site, are built too close to the boundaries, and the large footprint has left no room for the Heritage buildings to “breathe”. The “canyon” effect which was the concern of the planners has not been addressed between Blocks A and B.

In addition, there is a detrimental effect on existing neighbours: The Mews block is built very close to the boundary, causing issues with overlooking and Block A towers above Primezone Mews. The proposed development has an impact on daylight and sunlight for adjoining neighbours, both within their properties and also on their amenity spaces. There is also an impact on available daylight and sunlight within the development itself.

We disagree with the following:

Hornsey Town Hall Sunlight and Daylight Assessment, 10.4 The Proposed Development will relate well to the neighbouring residential properties. Where there are deviations from BRE guidance in terms of VSC and NSL alterations, these are considered to be minor in nature and acceptable due to the relatively minor alteration in VSC and NSL values when compared to the Consent.

The scheme has not been developed in the context of best practice guidance. The following document gives guidelines for overshadowing of neighbours. This scheme contravenes these guidelines: it is built too near to the boundary and is too high, thus overshadowing neighbouring amenities and open space within the development itself.

We draw your attention to The BRE guidelines extracted below:

BRE SITE LAYOUT PLANNING FOR DAYLIGHT AND SUNLIGHT: A GUIDE TO GOOD PRACTICE.

Paragraph 3.3 "Good site layout planning for daylight and sunlight should not limit itself to providing good natural lighting inside buildings. Sunlight in the spaces between buildings has an important impact on the overall appearance and ambience of a development.

It is valuable for a number of reasons:

- To provide attractive sunlit views (all year)
- To make outdoor activities like sitting out and children's play more pleasant

AND:

The availability of sunlight should be checked for all open spaces where it will be required.

Page 14: "This guidance applies both to new gardens and amenity areas and to existing ones which are affected by new developments. . . . It is important to realise that the area-based guideline is very much a minimum standard."

We believe this scheme flaunts good practice guidelines in relation to overshadowing of its neighbour's amenity spaces and in relation to daylight and sunlight across the development. We have done our own 3D modelling to show this, attached at the end of this letter. We want the applicant to provide all year round accurate 3D daylight modelling for the site and surrounding streets, to show the effect of overshadowing throughout the year.

5. Density

The proposed development is for 146 units. The applicant has calculated the density as 162 units per hectare. HTHPS Policy Context 7.75 illustrates the London Plan Policy 3.4, showing its table 3.2 - Density Matrix (habitable rooms

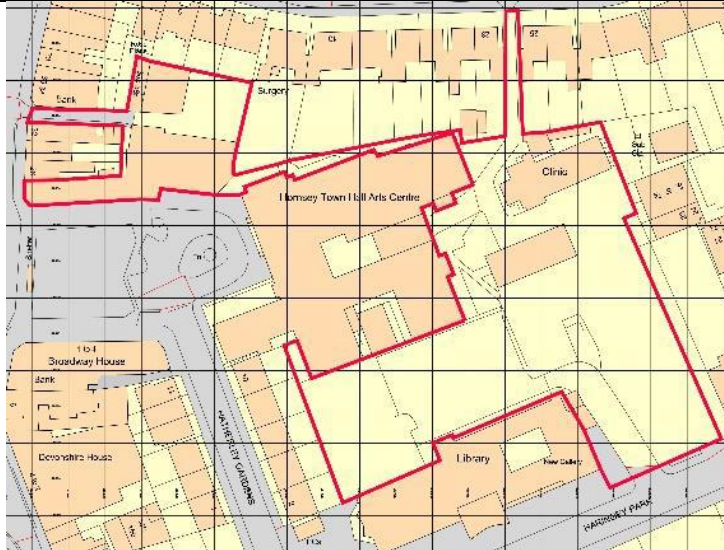
and dwellings per hectare). The developers note that the site is in an area with a PTAL rating of 2 to 3 (which is actually at the lower (poor) end of the scale) and suggest that as a density of 45 -175 units per hectare is allowable, they argue that a density of 162 dwellings per hectare should be acceptable.

This is an incorrect and flawed argument.

The developers have included the Town Hall 'square' as developable site area for calculation of density, inflating the available site area and decreasing the actual density. The Town Hall 'square' should not be included in the overall site area for calculation purposes; it is a public space, which by the Council's own criteria is dedicated to Community, was never intended to be built upon and whose inclusion in the site area calculation serves only to dilute the scheme's real density. Similarly, the inclusion of the Town Hall itself, when this area is not part of the application for residential construction, should not be included in the calculations.

The diagram below shows the site area that should be used for calculation of density – removing the Town Hall Square and Town Hall and Hotel (or aparthotel). The relevant area is outlined in red, (although we are concerned by the inclusion of Rose Place in the Developer's proposals and calculations)

Site area for Density calculation purposes:



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Actual site area for density calculations: 0.78 hectare

Residential units: 146

Density = 187 units per hectare or 409 habitable rooms per hectare

This is above the range indicated in the London Plan Policy.

Furthermore, if the 67 “aparthotel” rooms, which are shown on the drawings (but not referenced in the Planning Statement) - and for which the Viability report (redacted) assumes an 80% occupancy rate - are also included in the density calculation, then the Density figure becomes even more alarming.

Lack of amenity space

HTHPS (7.13) states that nearly all dwellings have private amenity spaces except Broadway Annex which are intended to share the “public” Town Hall square as amenity space. This Town Hall square has been designated for public use and is already under pressure from existing local residents and community uses. It should not have to bear the strain of inadequate amenity provision in the proposed development.

6. Lack of social housing

Haringey Borough Council has set a minimum target of 40% affordable housing in new developments. The inclusion of 0% affordable housing in this scheme is risible and a disgrace. We refute the proposed viability assessment (redacted) and urge Haringey to demand the provision of more affordable units in this scheme.

7. Transport, Parking and Vehicle Movement

Inadequate Public Transport

The potential increase in population of more than 500 people, including the hotel or aparthotel guests will have a severe impact on the limited public transport that exists in Crouch End. Already the queue for the W7 bus snakes all the way to the clock tower during morning rush hour, with buses going past Crouch End Broadway full and unable to pick up more passengers.

In recognition of the poor public transport facilities serving Crouch End, the developers propose a shuttle bus. This will cause more pressure at the bus stops, puts undue pressure on Hatherley Gardens residents and creates a shared pedestrian/vehicular area in Town Hall Square, all of which is unacceptable and dangerous.

Vehicle Movement

The Deliveries and Servicing Management Plan (3.4.2) lists 54 extra vehicles per day, (ranging from delivery vans and pick-ups to two and three axle lorries). We believe this figure will be a minimum. The Plan goes on to place the onus upon residents and staff to request that “each time an order or booking is placed the supplier or service provider is sent by e-mail a map confirming the location of the site, the location of the on-site service yard area and the local routing to be undertaken,” (4.3.4) as the basis for ensuring that traffic behaves as the Developer’s would like. This is an unreasonable and unrealistic request. We believe traffic will still turn to the east of Haringey Park, thereby prejudicially affecting the surrounding streets.

Parking

40 Parking spaces is an inadequate provision for 146 flats and hotel or aparthotel rooms. Whilst we understand the council will not issue more residents permits, the situation at present is that car owners simply move their cars from one zone to another within Crouch End CPZ depending on the timing of parking restrictions. Evening parking is extremely difficult at present and with such scant provision for this development, the situation will become worse. Similarly there are no car parking facilities for social events in the Town Hall and this too will have an impact on available parking in surrounding streets.

HTHPS Policy context (7.15c) states that Emerging Development Management Policy DM53 sets out a number of tests for

hotel uses to be acceptable including: "Provide appropriate arrangements for pick up / drop off, service delivery vehicles and coaches, appropriate to the size of the hotel or visitor accommodation."

No details have been provided for the coach access and no information to show the impact on existing residents.

8. Deficiencies in Social Facilities and Infrastructure

Inadequate infrastructure – lack of local schools, doctors surgeries.

The scheme proposes an extra 467 people in the dwellings alone – not including the hotel or aparthotel. Where are the extra local doctors that will be needed to service the increased local population?

Of the 146 dwellings, 97 are for more than 3 persons and can therefore assume to house families. Analysing the information gives a potential increase of 189 children in this area. We have not seen any indication that the local schools and nurseries in this area of Haringey, already oversubscribed, can cope with the potential extra need for places.

9. Reduction of office space

HTHPS 7.46 The proposal comprises provision of 443 m2 of high quality flexible co-working office space, as well as additional flexible space that could be used for working. According to the HCA Employment Densities Guide (2015), this will support between 30 and 44 jobs.

Hornsey Town Hall currently has approximately 75-80 businesses comprising a variety of arts and business disciplines, forming a vital community in central Crouch End. In 2016 it was calculated that approximately 130 people earned their living in Hornsey Town Hall. In addition to these numbers there are also the people who make casual hires – choirs, dance classes etc.

The Mayor of London (http://www.sadiq.london/business_prosperity_and_opportunity) is keen to "Prevent the loss of business space" and "Promote the provision of small business and start-up premises in housing and commercial developments through the London Plan". Those in the Town Hall at present have the type of accommodation the mayor is referring to – not the developer's proposed shared space for a mere 44 people.

We urge you to refuse permission for this scheme for the reasons stated above.

Appendix: we have added our own 3d Modelling below to show the affect of this development on our neighbourhood – both in terms of scale and overshadowing. We would like to see the same interactive model produced by the applicant.

View showing Hatherley Gardens with the new flats looming behind

View on 21st September at 12pm showing overshadowing of Weston Park from new Mews block, and the proximity of one to the other.

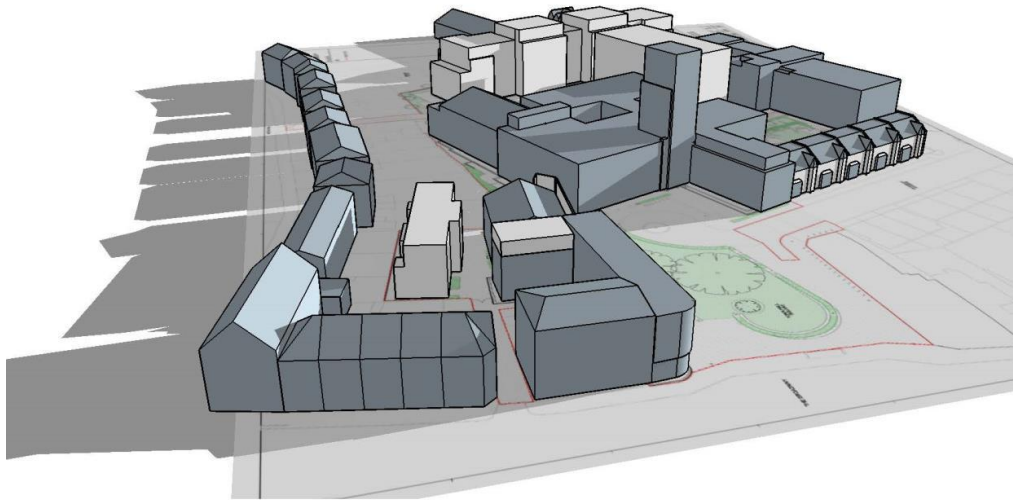
3D MODELLING TO SHOW RELATIVE SCALE AND OVERSHADOWING. To the best of our knowledge these are to scale but we wish to see the same interactive model produced by the applicant



View showing Hatherley Gardens with the new flats looming behind



View on 21st September at 12pm showing overshadowing of Weston Park from new Mews block, and the proximity of one to the other.



View on 21st December at 12pm showing overshadowing of Weston Park from new Mews block and most of new development in shadow.



View on 21st December at 12pm showing overshadowing of Primezone Mews, and most of new development in shadow. As the sun moves round to the west, the whole of Primezone Mews is in shadow.



View on 21st June at 4pm showing overshadowing of Primezone Mews during Summer. As the sun moves round to the west, more of Primezone Mews is in shadow.

Weston and
Haringey Park
Residents
Association

(Additional
Objection)

We are in receipt of the response from Collective Planning, to our letter of 21 August 2017 and we wish to reply to the arguments put forward in that response, as follows:
Views:

It is believed that the concept of “verified key public views” has been subverted by the developer to mask the full impact of the development on both the Town Hall and surrounding properties. It seems unlikely that it was the intention of LB Haringey, when imposing a requirement to demonstrate the scheme’s limited visibility from The Broadway and surrounding areas, by means of these views, that these were to be the only 3D representations of the scheme in relation to its context; yet that is all that has been provided. The limited information available from cross-sections of the Site is not conducive to a proper public discourse on the relative merits of the scheme. In response to our original letter,

Collective Planning proposed using verified Winter views from a previous scheme, amended to reflect the changed heights of the current proposal. Apart from the seemingly penny-pinching nature of such a proposal, these views were to “be issued to the Council within the next 2 weeks.” They have not yet materialised.

In consequence, and to give a fuller impression of the scheme’s impact upon the surroundings, we issued our own 3D images of the proposals which we challenged the developer to refute. They have not done so.

Apart Hotel:

It is helpful that the Developer has now clarified that the proposal is for a hotel. However, the term is broad and it would be helpful to have precise details as to what kind of hotel is planned. The European Consumer Centres’ Network assesses hotels in the UK according to the following criteria:

- 1 star hotel: all rooms ensuite or private;
- 2 star hotel: dinner usually available every evening;
- 3 star hotel: all rooms ensuite, room service also available;
- 4 star hotel: 24-hour room service and 50% of rooms have a bath and a shower;
- 5 star hotel: a number of permanent suites and enhanced services e.g. Concierge, full afternoon tea.”

The developer should indicate which of the above classifications it is anticipated these ‘30-day stay’ rooms (with built-in kitchen furniture) will occupy and how they will be marketed. We continue to maintain that these rooms exceed the normal classification of Hotel accommodation and will further exacerbate the already problematic situation relating to transport in the area.

We would anticipate that, in any future Planning Approval that may be granted, a Condition is imposed such that this accommodation, however initially construed, can never be converted into flats for rent or sale.

Building Heights:

The response document refers to Block A being ‘set back’ from Haringey Park; this ignores the fact that the block projects some way in front of No.13 Haringey Park and that it is only this projecting element that is 3 storey. Behind this, as it rises to 5-storeys, it obscures the Library building when viewed from Haringey Park. Its remaining bulk looms over the rear gardens of Haringey Park dwellings in a manner completely out of character with the conservation area.

This is without reference to the block's overall mass completely dominating the Primezone mews development, of which the smaller building sits just a few metres away. We would remind the Council of its planning guidance in Policy DM3 – current until the latest iteration of the Development Management DPD, adopted 2017 – whereby 20m was the required distance between habitable windows facing each other. For every increase in floor level, a further 10m set-back was required.

Even with the necessary re-consideration of the density requirements for all London boroughs that gave rise to this policy being dropped in the adopted DPD, the ethics of permitting such a disjunction now, must surely be regarded as a complete denial of any existing resident's rights.

To highlight the enormous disparity between the current application and that of the permission granted in 2010 - which FEC insists is little more than a 'tweaking' of that permission - we hereby submit those 2010 drawings, with the outlines of the current proposal super-imposed on them in red. We believe that this more accurately demonstrates the true bulk of the present application, than their own, very poor, images would suggest and again, we challenge the developer to disprove the argument.

As with the 3D model, we do not presume to insist upon the exact accuracy of these images; it is the best that can be managed in the circumstances.



SOUTH ELEVATION 2010 scheme with outline of current proposal, in red

NORTH ELEVATION 2010 scheme with outline of current proposal, in red



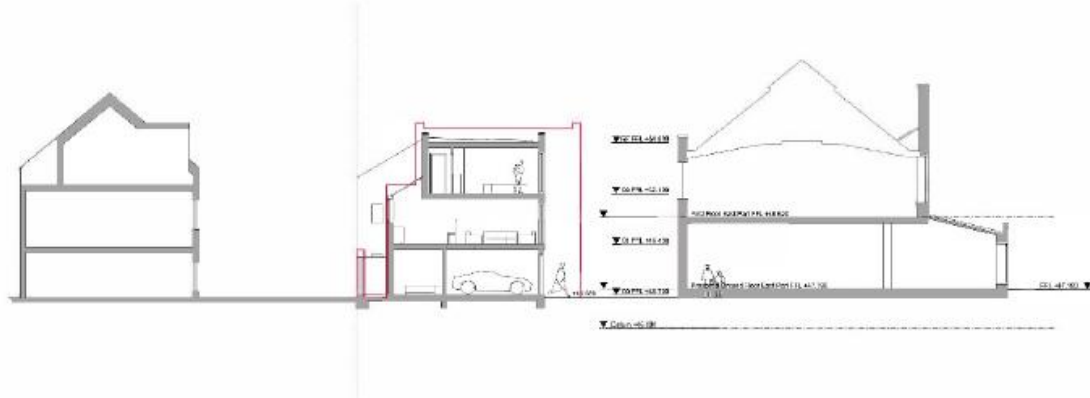
WEST ELEVATION 2010 scheme with outline of current proposal, in red



SECTION L-L 2010 scheme with outline of current proposal, in red



MEWS BUILDING 2010 scheme with outline of current proposal, in red



By reason of their height, bulk, scale and massing, together with the overly large footprints of Blocks A and B (see below) this proposal is not a quality development overall, contrary to Policies 3.5, 7.4 and 7.6 of the London Plan 2016 and does not make a positive contribution to, or improve the character and quality of, the Conservation area in which it is located, in conformity with the principles of DM1 02B or 02D of the Development Management Plan (as adopted 2017).

Effect on Listed Buildings and Conservation Areas:

The response notes that “A revised Heritage Statement was submitted on 25th August 2017”. Whilst it is accepted that a revised Historic Building Report was submitted, that revision makes not one single reference as to which sections of the vast and complex document - so large it comes in three volumes – were revised and nor was the document itself listed on the Cover letter which accompanied the remaining documentation submitted on that date. We have found no evidence of a stand-alone document entitled ‘Heritage Statement’ and would be grateful for either the Planning Department’s, or Collective Planning’s guidance, as to which document this Statement may be found in. Until such time, we consider that the development proposals run counter to the principles of DM9 (DPD 2017) Section E of which states:

Proposals for alterations and extensions to existing buildings in Conservation Areas should not appear overbearing or intrusive.

We understand that LB Haringey has an obligation to approve proposals for enabling development of

Listed Buildings where it is demonstrated that: “It is the only viable means of securing the long term future of the asset affected; and...it is the optimum viable use, supported by an appropriate options appraisal” (Policy DM9_J (Enabling development))

However, we are not satisfied that these requirements have been met in this instance; furthermore, we would refer you to the comments from the Hornsey Historical Trust, noted below in the section: Massing and Footprint, in respect of the impact of this development on the character and form of both the Listed Buildings and the wider Conservation area.

Massing and Footprint:

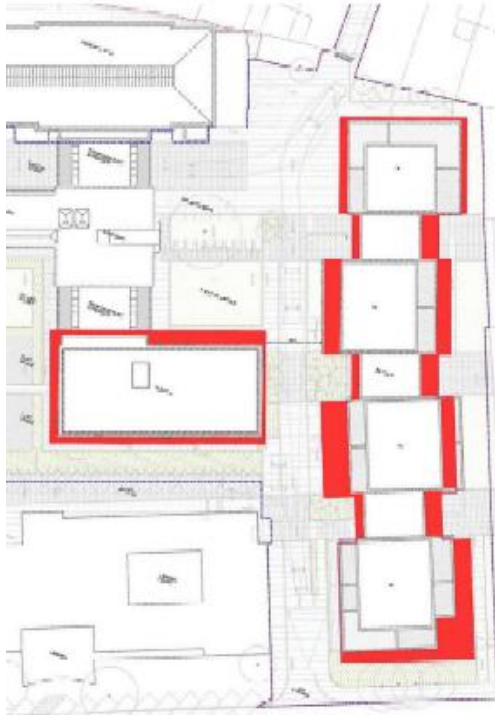
Our stated opinion, that “the new buildings occupy too much of the site, are built too close to the boundaries and the large footprint has left no room for the Heritage buildings to ‘breathe’” does not appear to have been addressed by the respondent.

Nevertheless, to further substantiate our argument, we hereby attach an extract from the Site plan for the 2010 permitted scheme, with the increase in footprint of the new Blocks A and B, shown in red. It is believed that the image shown below is a reasonably true representation of the expanded blocks, over the 2010 approved scheme, and taken together with the dramatically increased heights of these buildings, as shown above, we maintain that this new scheme will alter the conservation setting of the Town Hall beyond repair.

This opinion is supported by the Hornsey Historical Society who, while welcoming – as do we – the proposals to preserve and restore the Town Hall, consider these two blocks to be:

“unacceptable in that they are too massive and completely out of scale with the urban fabric of Crouch End and with the Town Hall itself. They will have a detrimental effect on the appearance and character of the Conservation Area, Town Hall and Library and be an unfortunate visual intrusion over a large part of the area..... Block B looms over the library in Haringey Park and seriously detracts from the setting of this listed building.”

“we are of the view that the proposed increase in height to both Blocks A and B, over that originally granted permission in the (2010) Scheme, will result in harm to the historic environment.”



Blocks A and B 2010 scheme, with current proposal's additional footprint, in red

Such harm is further demonstrated by the virtual model of the scheme - which we felt obliged to prepare because the developer could not or would not provide one (see below) - which has been inserted into Google Earth. This shows the dominance of Blocks A and B over both the Library building and the Town Hall. The two and three Victorian storey houses are similarly swamped by the height and mass of what, to the Victorian street pattern are simply alien forms.

VIRTUAL MODEL 2017 scheme inserted into Google Earth



Daylight

The response document commented at great length on the issue of Daylight; we would refer you to the comment made on behalf of PrimeZone Mews residents, which is re-stated below:

“The current Revised Daylight report says readings are based on APPROVED agreements from the planning application HGY/2010/0500.....(P)lanning consent was only given subject to approval; from meeting minutes, July 12th 2010, PC44: approval will only be given subject to a re-examination of the daylight assessment. This was a BRE recommendation, (given).....in spite of the comment from David Williamson, Project Officer, who said the daylight report had been validated and that they were confident it was accurate.

The latest Daylight report for the proposed development says it is 'in keeping with the conditions for the previous approved development'. So, in keeping with the recommendations, we assume there was a re-examination of the daylight (and) we would like to see this PRE-REQUISITE report.”

We understand that the developer considers that a satisfactory case has been made to demonstrate that the daylight levels to individual properties, with certain exceptions, will not be much more adversely affected by the current proposal than they were by the 2010 scheme and would, in effect be “minor in nature and acceptable”.

We consider this argument to be flawed. We concur – and can demonstrate from our own modelling – with the statement made by the Hornsey Historical Trust that:

“The two blocks A & B will seriously overshadow each other at certain times of the day. Block A is considerably higher than the scheme previously approved and by ignoring normal daylighting standards on the boundary will,, permanently blight the land to the east and prevent any long term more sympathetic development of the area....

Block B looms over the library in Haringey Park and seriously detracts from the setting of this listed building. The lower floor flats facing the narrow chasm between Block B and the Library will be severely blighted by lack of sunlight and prospect. We note that most of the flats are single aspect only which, with such a congested development as this, could lead to unsatisfactory conditions with respect to orientation and ventilation.” We consider that the resultant impact by this scheme on the amenity of both existing and proposed residents, to be contrary to London Plan policy 7.6 and Haringey’s own Local Plan policies DM1, DM2 and DM6 and we urgently request an independent evaluation of the claims made and the calculations provided.

Density:

The respondent re-states the overall site area, at 1.32ha and continues to assume that it is entirely reasonable to conclude that all of this area should validly constitute ‘land upon which it is deemed reasonable to build.’ This is precisely where we differ. The ownership over the Town Hall Square that has been granted to FEC is, in effect, that of Trustee status; apart from the obligation to re-furbish this area, they have no license to build on it – and as such, we disagree that it forms any part of ‘their’ site area; it is Community land, held in Trust.

On this basis, we reiterate our view that the real density of this development – even when excluding the ‘Hotel guests’ – will exceed the London Plan maximum, by creating 187 units per hectare, well above the 162 units/ha. that the developer believes is the correct value for an area with a PTAL rating of 2-3..

Lack of amenity space:

The respondent has stated his belief that the North facing spaces that are now proposed for the ground floor properties at the Mews , hidden behind a 2.0m high brick wall, constitutes a well-planned amenity. We do not accept this and believe it runs counter to agreed principles in respect of such provision. We look forward to receipt of further amendments to improve this proposal.

Lack of affordable housing:

The Viability statement, which is yet to be validated, demonstrated a profit in excess of £22 million. This amount appears to be achievable after discounting the CIL contribution and the necessary sums for the restoration of the Town Hall and gives a yield of approximately 20% (equivalent to 25% when compared to UK tax paying entities) This would be regarded as handsome remuneration for retail and manufacturing enterprises in this country, which operate closer to between 3 and 5%. We therefore firmly believe that it should in no way exonerate the Developer from conforming to the Council's obligations in respect of both the London Plan and its own Local Development Plan, in the provision of affordable housing.

Transport, Parking and Vehicle movement:

We consider that the proposed development, by reason of the lack of sufficient parking will generate increased on street parking demand, which will result in significant adverse impacts on the existing onstreet car parking pressures, which will further impact on the amenity of existing residents and the street-scene contrary to Policies 6.3, 6.10 and 6.11 of the London Plan 2016, Policies SP1 and SP7 of the Haringey Local Plan 2013, Saved Policy M10 of the Haringey Unitary Development Plan 2006 and Policies DM2, DM31 and DM32 of the Development Management DPD January 2017.

We would also point out that there although there is an estimated requirement for a large number of cycle-spaces planned for the Town Hall Square, these have not been shown on plan and must therefore be added to the rather long list of omissions with which this scheme is littered and which therefore make it ripe for refusal.

Reduction in Office Space:

In response to the "re-provision of high quality modern and efficient co-working space" that is mooted in the Response document, we would refer you to the excellent and well-documented arguments put forward by the Hornsey Town Hall Traders Association to support the case that the existing provision far exceeds the current vague promises made by the current developer. As this argument has been extremely well covered by both the above organization and by the response from CENF, no further comment is required.

Summary:

It is our considered opinion that the proposed development, by reason of its overall bulk, scale, massing

	<p>and poor design would introduce an overly large and discordant feature to the area and would detract from the setting of the Hornsey Town Hall. It would furthermore fail to preserve or enhance the character and appearance of the conservation area in which the Town Hall sits, causing substantial harm to it, contrary to Policies 7.4, 7.6 and 7.8 of the London Plan 2016, Policies SP11 and SP12 of the Haringey Local Plan 2013, Saved Policies CSV1 and UD3 of the Haringey Unitary Development Plan 2006, and Policies DM1 and DM9 of the Development Management DPD January 2017.</p> <p>In addition, by reason of its excessive density, it results in an overly cramped environment that fails to create a sense of place, resulting in a poor quality development with an over provision of 1-bed (33) and 2-bed units (95) and poor living environment for future occupiers, contrary to Policies 3.4, 3.5 and 3.8 of the London Plan 2016 and Policies SP2 and SP11 of the Haringey Local Plan 2013, The Mayor of London's Housing SPG, and Policies DM1, DM11 and DM12 of the Development Management DPD January 2017 and we urge you to recommend that the Committee reject the application.</p>
<p>Hornsey Town Hall Appreciation Society</p> <p>(Letter to Dean Hermitage. LBH Head of Development Management)</p>	<p>We, the Hornsey Town Hall Appreciation Society, believe that this is a development of strategic importance and should have been referred by Haringey for Mayoral consideration. We further believe that the nature of the application, and the context within which it sits, mean that Haringey, as Local planning Authority, should approach the Mayor for a direction under section 7 of the The Town and Country Planning (Mayor of London) Order 2008 to the effect that the Mayor should in this case replace the Local Planning Authority.</p> <p>Our reasons for requesting the referral are:</p> <p>1) the scheme anyway qualifies for referral because of the number of habitable units proposed. There is no definition in the application how the 'hotel' will work. There is no reception and no dedicated catering. It does not look like a hotel. There is nothing in the application to prevent the future sale of these units to investors. Therefore the 67 self contained living units inside the Town Hall should be treated as potentially permanent homes, and when added to the 146 dwellings in the enabling scheme, bring the scheme beyond the 150 needed for a mayoral call in.</p> <p>2) Hornsey Town Hall is a building of real significance, listed Grade II*. Every scheme ever put forward for the Hall has described it as an 'Arts Centre for Crouch End, the borough and beyond', and the designated buildings preservation trust is calling for a 'world class renaissance'. Haringey's assessment of the scheme as purely local, thereby excusing an Environmental Impact Assessment, feels wrong, and suggests that it will be difficult for the planning department to remain objective in the current context.</p>

3) Under category 3E of the Mayor of London order 2008, the application should be referred because:

- it fails to meet affordable housing targets (policy 3.11)
- it removes much office space currently in use, where there is a demonstrable demand for more - ANA has a waiting list for such space (policy 4.2)
- it heavily weights what should be a mixed use development in favour of residential (policy 4.3)
- both the hotel at 2,689 sq metres, and the D1/D2 use at 3,162 sq metres, exceed the specified threshold of 2,500 sq metre.

The reasons for requesting that the Mayor replace the LPA are:

- 1) Under section 3(a) of the order this scheme does not achieve a sufficient level of affordable housing;
- 2) Whilst Haringey has plans for higher levels of affordable housing in future developments it is not currently achieving the necessary level;
- 3) The scheme is in breach of the terms of the OJEU procurement bid, in which it was stated that an earlier planning application would be implemented with only minor amendments. This 2010 permission had 4 units of affordable housing. This does not meet the overall Haringey target for affordable housing. The applicant has now stated in a completely new application, that there will be no affordable housing. There are further breaches of the OJEU agreement, including the dropping of the 4* hotel, and the creation of an Arts Centre, for which no business plan has yet been provided;
- 4) Under section 7(1)(c) of the 2008 Order there are sound planning reasons for a call-in. The LPA must not only remain impartial, but must be seen to be impartial. Crouch End's councillors have now published an open letter which suggests a state of disorder in respect of the application, which needs to be rectified. Haringey's cabinet has twice voted for the scheme in the face of call-ins. Disciplinary action against Labour councillors involved in the call-in sets a context in which it will be very difficult to select a neutral and objective planning committee to consider the application;
- 5) There are a number of factors in the Mayor's Supplementary Planning Guidance "Homes for Londoners" published this month, which point to the need for a call-in. The councillors open letter makes clear that the ward councillors have not examined the viability figures and were unaware of the assumptions the developer was making. The figures in the Economic Viability Assessment have, by chance, become public, which is fortuitously in line with the Mayor's guidance. However these figures have been seriously called into question for a number of reasons, including, but not limited to:

	<ul style="list-style-type: none"> · inappropriate comparators for sale prices which refer to Muswell Hill and Hornsey, while prices in Crouch End are higher · inappropriate comparators for rental income - it is absurd to suggest that Hornsey Town Hall is in anyway comparable to the Ministry of Sound, yet a notional rent greater than that of the nightclub has been used to calculate the community use subsidy · vague references to the proposed investment in the restoration of the Town Hall - while the headline figure of £27m (sometimes quoted as £29m) appears impressive it may well be that around £13m of this is actually being invested in building the hotel. <p>We therefore believe that the scheme should now be referred for mayoral consideration and that the mayor should replace Haringey as the LPA.</p> <p>While this request is addressed to the Head of Development Management at the London Borough of Haringey we propose to publish it as an open letter on various websites, and to send a copy to local newspapers, the Mayor's office and others of influence.</p>
Friends of the Earth - Muswell Hill & Hornsey	<p>I write on behalf of Muswell Hill & Hornsey Friends of the Earth. We are the affiliated local group of Friends of the Earth England, Wales & Northern Ireland.</p> <p>Humanity has only a few years to cut emissions enough to keep temperature rise below 2°C, as former UNFCCC head Christiana Figueres and others recently highlighted: https://www.nature.com/news/threeyears-to-safeguard-our-climate-1.22201 It is unacceptable that the residential blocks in the proposed development would achieve only about 44% of the carbon reductions specified in the GLA target. A new development provides an excellent opportunity for state of the art zero carbon building, which can achieve reductions more efficiently than retrofitting.</p> <p>Haringey has a long commitment to reducing climate change. As the proposed development is in a highly visible location, it is all the more important for Haringey to insist that the buildings provide a good example. The fact that the developer expects to make a £22.6m profit underlines that there is every reason why the development should incorporate the highest environmental standards. Permission should be denied for any proposal which is not at or very close to the target in the GLA Zero Carbon Policy.</p> <p>Tim Root Co-ordinator Muswell Hill & Hornsey Friends of the Earth</p>
Crouch End	Crouch End Festival is primarily concerned with the use and availability of the Town Hall

<p>Festival</p> <p>Neither supports nor Objects</p>	<p>Square and Green, and (latterly) of the interior performance space of HTH itself. While the organisers may (and do) have their own personal opinions on the suitability of the residential development, the hotel use, etc, there are many groups and individuals better equipped to comment on these issues than we are.</p> <p>We restrict ourselves here to comments on elements of the development that directly affect CEF. Crouch End Festival is the UK's largest community arts festival. It has been running summer and Christmas events in the Town Hall Square for 6 years as well as in the Town Hall since its recent reopening. It has grown from a small local event to a major fixture in the north London calendar. Audiences come from all over London, some events attracting visitors from around the UK.</p> <p>It represents the interests of local groups in their use of indoor and outdoor Town Hall spaces for creative and community purposes. In the summer it takes over the Square and Town Hall spaces for 10 days as well as many other performance and arts spaces all over Crouch End, Hornsey and Stroud Green and beyond. The festival events include drama, film, music, comedy, dance, art exhibitions, workshops, lectures, meetings, markets, and much more. Each December for the last 4 years it has organised a large Christmas tree and lights switch on ceremony with a local celebrity and a one day Christmas market with live music, food and drink. The first local Christmas tree in the square for 57 years and Crouch End Christmas would now be unthinkable without it. Local businesses help fund the tree and the Festival organises a 'Shop Local' campaign.</p> <p>The Festival has formed partnerships and supported the growth of other local arts and community groups including the Muswell Hill Creatives, Tottenham Ploughman, the Mill Hill festival, and even visitors from Canada who've come this past year to see how Crouch End Festival is managed; the open air markets in summer and at Christmas support local artisan crafters and food and drink sellers, works with local businesses and shops, and provides a platform for creatives to take first steps, flourish, and grow. It also works in partnership with many local schools to provide a platform for students to perform. The Square and Town Hall have historically and geographically stood at the centre of the community and are the natural focus for all community events. As a Town Hall it was designed and intended partly for the use of the community and as a venue for performances and events.</p> <p>The need and desire for this kind of use has been demonstrated by the Festival events and ANA's use of the building throughout the year. This is clear from the ever-growing audiences that attend the festival and ever-growing number of events and participants.</p> <p>The idea that the festival should not take place or should move to another venue is unthinkable.</p>
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Any future plans and designs for the use of the Town Hall and square should accommodate outdoor and indoor community arts events (such as the Festival organises) as a priority.

Our Comments:

Design of the Square

The square should be designed and planned for flexible use by the community in a variety of ways. Everyday use and special event use. The present plan is not flexible and does not take into account the current use by the Festival or everyday use by the community. The amount of grass and hardstanding and where this is positioned is crucial. Likewise seating should be flexible and allow for large crowds to dance, picnic or just sit and enjoy performances. This is not possible with the present design. It should allow all Crouch Enders to assemble and safely enjoy the square without any risk from traffic or vehicle access ; it is not clear what kind of access by the Town Hall is intended for vehicles with the current plans.

Greenery (grass, trees, and plants) - trees and plants should be appropriately chosen and positioned to enhance the square and not impede its flexible use. Any grass should be sufficient and in the right position to allow for everyday sitting and picnickers as well as special events. The current plan does not provide for this. Christmas tree - there should be a permanent place where a live tree can be planted permanently and decorated each year. Alternatively a concrete pit/base that can fit a large tree to be supplied each year.

Power - outdoor events need electricity for lighting, sound, to heat and cool food and drinks and other reasons. Throughout the square adequate supply points should be incorporated. **At present no supply points are incorporated.**

Cafes and restaurants - should likewise enhance the square and not overwhelm it or take up public space with over large terraces etc. Any terraces and seating should be non- permanent or moveable.

In summary as regards the square, proper and more detailed consultation is needed with users of the square, including Crouch End Festival (who are the main users for outdoor events). The consultation so far has been very superficial: no proper consultation with the Festival and minimal consultation with a small number of the public who attended the Hub Days earlier in the year.

Small businesses accommodation

Crouch End Festival supports creativity at all levels. It particularly plays a part in helping amateur or part time creatives (performers, crafters, etc) develop and move to a professional level. There has been mutual support between the festival and the creatives and small businesses that have flourished in the Town Hall.

	<p>The Festival has benefitted and been able in turn to use their professional skills and we have been able to promote their businesses.</p> <p>We feel strongly that creatives and small businesses are the lifeblood of the building, they have been the unexpected stand out surprise success of the last two years in the Town Hall. Local creatives and small businesses should be encouraged and more space found for them, not rehoused somewhere distant and disconnected from Crouch End; they form a crucial and indispensable part of the local community. All over the UK small creatives and businesses are having entire buildings and sections of cities ('quarters' - cf Birmingham's Custard Factory quarter) created for them of the kind that already exists successfully in the Town Hall. The creative community offices and workshop space should be enlarged at the community centre not reduced to a café setting.</p> <p>Community Use</p> <p>The Town Hall is integral (always has been) to the life of the community for multiple uses community uses from weddings to meetings to festivals. Since it reopened 2 years ago it has been brought to life by ANA. The community use and access agreement in its present form is weak in structure. It needs a lot of work.</p>
Hornsey Town Hall Traders Association	

Objection to loss of B1 studio/office space In Hornsey Town Hall (HGY/2017/2220)

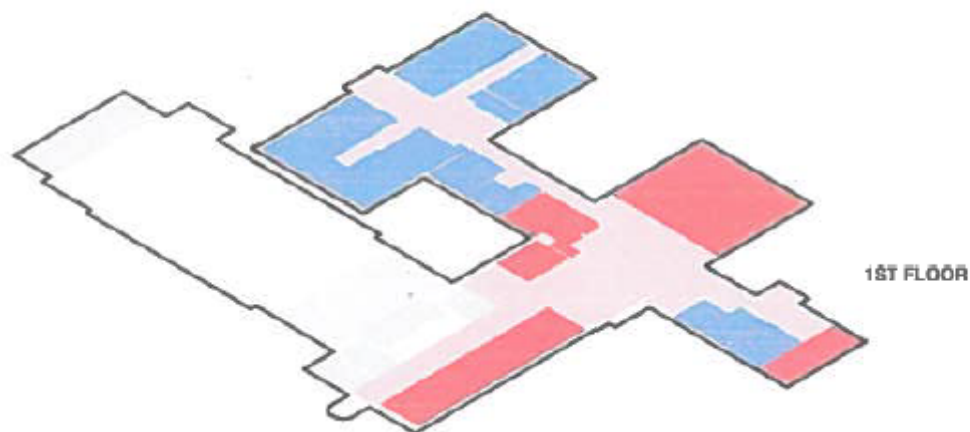
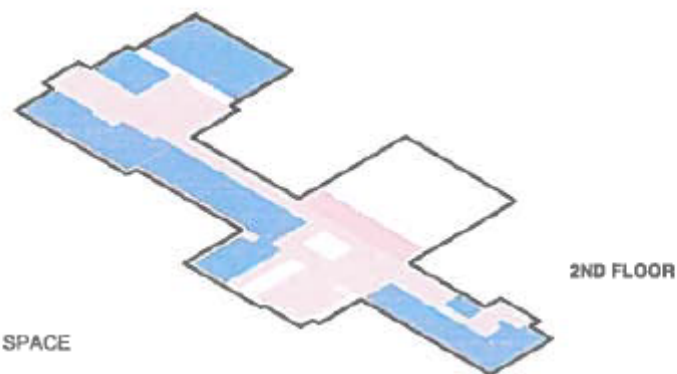
Hornsey Town Hall (HTH) traders association formed in 2015, with the aim of sharing resources, ideas, and information. It also encourages networking between related professions within HTH, shares information on local markets and events related to our fields of work. We have outlined below the key issues in support of the current use:

1. Current use of Hornsey Town Hall

- 1.1 The office spaces contained in the administrative blocks of Hornsey Town Hall were built for purpose. Although the local authority vacated the building some time ago, for the last three years the spaces are once again profitably occupied and continue to serve as B1 type use.
- 1.2 The current provision in the administrative blocks of Hornsey Town Hall (managed by ANA Arts, founded 2014) is a creative business hub and open workspace, with managed office spaces, small workshops, and creative studios. Highly flexible, with both small and large spaces, it provides an ideal environment for a range of local small enterprises and start-ups, designers, small producers, tech, and professional services.

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| | <p>1.3 Community uses are also supported, with affordable space for small studio and rehearsal use, and a gallery offering a full programme of exhibitions and a strong base of community use.</p> <p>1.4 The majority of B1 space is in the form of self-contained offices of approx. 1300 sqm, with open plan co-working space of 158sqm. These figures are net internal areas, unlike the proposed application which we understand are gross figures. The diagram below summarises the current usage. You should be aware the applicant has labelled each of the spaces within HTH with the historical uses associated with the building when it was in operation as a council office, rather than representing current use.</p> <p>1.5 As tenants of HTH, we are aware the current use was intended as 'interim' arrangements pending redevelopment of the building. However this does not imply there is lack of demand for the current use, the use for which largely the building was designed. It is also not under-used, save for areas that have been made out of bounds for reasons of dilapidation, not for lack of interest or viable business use.</p> |
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1.6 We have paid rent over the last 3 years which have averaged at between £20-35 per square ft per annum dependent on unit size and quality. This is a rate comparable with typical market rates for similar property. A Crouch End Broadway B1 use unit has been recently marketed in a refurbished condition at £20 per square ft.



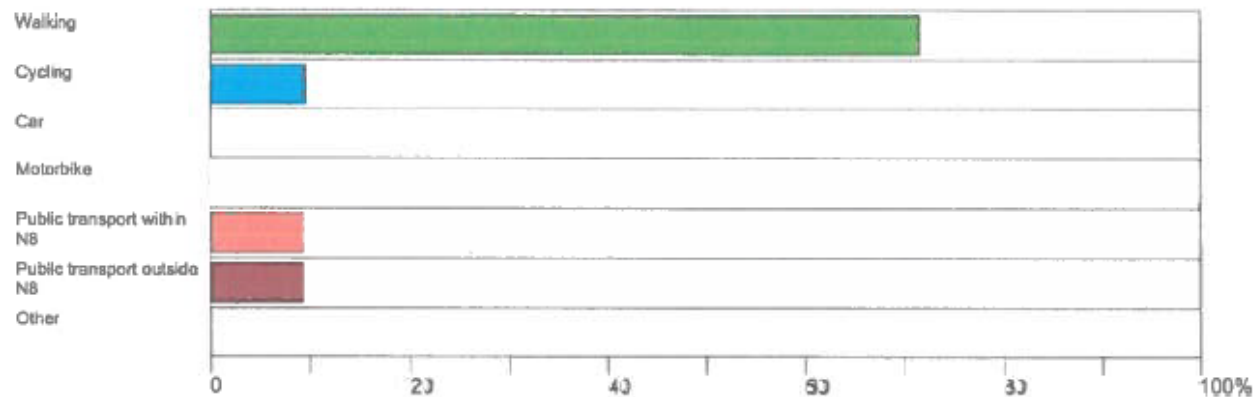
4 Transport

4.1 The current operation demonstrates exemplary standards in transport terms. A survey of all HTH tenants in September 2017 found that over 70 % walk to their place of work, just under 10% cycling.

4.2 At the time of writing, a new place of business after the building's redevelopment, is not clear for 85% of tenants, but the general expectation is that the place of work will require public transport to travel outside of N8. After redevelopment, this mode of transport is expected to form the largest proportion of new travel arrangements. This appears not to be factored into the proposed travel plan submitted.

Transport questionnaire for HTH tenants : results

1. How do you most commonly travel to Hornsey Town Hall?



2. Do you know your plans for relocating your business once Hornsey Town Hall is redeveloped?



<p>Primezone Mews Collective, 1- 28 Primezone Mews, N8 9JP</p>	<p>REF: HGY/2017/2220</p> <p>RE: PROPOSED DEVELOPMENT, HORNSEY TOWN HALL, CROUCH END Reference: HGY/2017/2220</p> <p>Collectively we are residents and tenants of Primezone Mews. Some of us have already objected but we have amended objections in response to the documents added more recently online.</p> <p>Following the planning submission for the above site, we are writing to ask you to refuse planning permission for the proposed amendments to the scheme for the following reasons:</p> <ol style="list-style-type: none"> 1. Inadequate and incorrect information; Contradictions of Haringey's own strategy recommendations <ol style="list-style-type: none"> a) Proximity to existing dwellings b) Daylight report c) Inaccuracy of views supplied by the architects d) Privacy issues e) Night light pollution issues 2. Height in relation to the neighbourhood; 3. Density 4. Transport, Parking and Pollution <p>Development in Haringey is currently guided by planning policies including those set out in:</p> <ul style="list-style-type: none"> ▪ The National Planning Policy Framework (NPPF) (2012) ▪ The London Plan ▪ Haringey's Strategic Policies Local Plan 2013 (amended with alterations 2017) ▪ Site Allocations DPD (July 2017) ▪ Development Management DPD (July 2017). <p>We will be referring to some of documents throughout, as they are policies set out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's strategy for achieving that vision.</p> <ol style="list-style-type: none"> 1. Inadequate and incorrect information; Contravention of Haringey Council Planning Policies <ol style="list-style-type: none"> a) Distances between dwellings; extreme nearness of building to current boundaries <p>Residents are entitled to enjoy a reasonable degree of space, privacy and daylight in and</p>
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around their homes.

We believe that the residents of existing properties will be unduly affected by this development.

- From the current architectural diagrams supplied, there are no boundary distances quoted between houses, and in particular, between windows looking in on habitable rooms:
- You have acknowledged in your privacy documents that they are close, and state there is 9m between Primezone buildings and the development. However the distances around the entire development have not been made clear in the plan of the areas. They look intrusively close. They are 7.5 m to the boundary wall. This is shy of 1.5m distances for a Party Wall Agreement. However...
- Because of lack of proximity distances in the plan, we feel there is potential risk to our properties: what protection is there in case of collapse of building; fire safety; subsidence? There are trees only 4m away from the Primezone boundary wall. Roots run deep and excavation could severely damage our foundations.
- You will be excavating under this building for a car park. Excavations could very well run into the 6m boundary limit and we'd like to see the car park excavation plan.

- Furthermore, we believe that Haringey Council is contravening policy in considering this application because it is not compatible with the environment or conditions.

Please refer to the quote from the council below which notes "Buildings should therefore be compatible with their local environment and conditions.

Reference Quote Comment Development Management
DPD, July 2017- page 11, Design and Character p2.9

The Council recognises that amenity can be compromised in a number of ways through development such as detrimental loss of daylight and sunlight to existing and adjacent occupiers; loss of privacy and outlook due to the proximity and design of developments; etc.

Buildings should therefore be compatible with their local environment and conditions.

We believe that Haringey Council is CONTRAVENING POLICY in considering this application because it is not compatible with environment or conditions

Summary:

INADEQUATE AND INACCURATE INFORMATION on BOUNDARY DISTANCE AND RISK TO PROPERTY

- In order to make an informed objection we would like to see correct architectural plans outlining the exact distances between all the properties in the area.

- We would like to see documents showing there is NO RISK from excavation for the underground car park
- Tree excavation plans
- Car park depth and excavation plans (including distance from the Primezone boundary wall
- How the surrounding area will be underpinned to ensure no subsidence to nearby properties or to the boundary wall?

b) The Revised Daylight report

This report is very dense and technical; it has not been made easy for people without technical knowledge to understand it.

It states that the effect of the construction of the Proposed Development upon the daylight amenity to the majority of the surrounding residential rooms is considered to be negligible and the occupants of these rooms are unlikely to notice any alteration to their levels of daylight amenity.

i. The current Revised Daylight report says readings are based on APPROVED agreements from the planning application HGY/2010/0500.

Historic planning consent was only given subject to approval; from meeting minutes, July 12th 2010, PC44: approval will only be given subject to a re-examination of the daylight assessment. This was a BRE recommendation. It was in spite of the comment from David Williamson, Project Officer, who said the daylight report had been validated and that they were confident it was accurate.

The latest Daylight report for the proposed development says it is 'in keeping with the conditions for the previous approved development'. So in keeping with the recommendations, we assume there was a re-examination of the daylight. We would like to see this PREREQUISITE report.

ii. Assumption of light levels in current and previous report: INACCURATE and MISLEADING Page 14, p 8.10 states the daylight results demonstrate that the majority of windows and rooms are fully BRE compliant by virtue of the fact that they would experience no change in their day lighting condition or less than a 20% reduction.

8.10 states the proximity of the garden wall has a limiting effect on the amount of direct sky visibility to the ground floor windows. This makes the bedrooms dependent on diffuse light as opposed to direct skylight.

Firstly, light is based on diffusing it via the wall, to a point. It's the BRIGHTNESS of the light in relation to how much sun is shining, and not the actual square of sky that sends light into the property. Light from the sun shines directly into this area throughout the afternoon and comes through the trees. You can see from the images supplied, this area gets sunlight. In the summer from 1 – 7 pm and winter this is the same until about 4pm.

However with the 70 feet concrete block towering above, only 7m from this wall, the sun will not shine through it. The BRIGHTNESS and quality of the light will be severely diminished.

The reports says that some rooms will have up to 30% less light (so contradicts paragraph 8.10), so how can this be deemed negligible?

‘There are 3 bedrooms located on first floor that experience a 30% reduction in VSC and ADF when compared to consented levels. It can be noted that the reduction equates to circa 5 absolute VSC points in reality, which is unlikely to be noticeable to occupants in daylighting terms. Overall, the daylight effect to these windows is considered to be minor.’

This report has used diagrams from the property website Rightmove to make assumptions about the light in Primezone properties. There have been no actual readings from the properties, or understanding of light reflections around the rooms. There is a great deal of assumption over reality, and at this point it's INACCURATE and MISLEADING.

The report also says the properties are lit by light from the front, reflected from other buildings, so a loss of light at the back would not matter. This is true for front rooms, but not the back rooms. They are not lit from the front.

The bright sunlight that you mention will disappear when it's blocked behind 7-storey tower (particularly in winter). See image below; this is mid summer, the sun tracks at around the height of this proposed building. It spring/autumn/winter the sun is significantly lower in the sky. The brightness will be severely reduced and have a major impact on light to Primezone Mews for all 28 properties. Because the developer has not provided image views of Block A from Primezone Mews, or shadow modelling, Haringey Council have insufficient evidence to make a valid assessment on whether this will or will not have a significant effect on the light to this area.

London
Plan 7.6, B

Buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings. We believe this build is in breach of the London Plan

7.6B

Summary:

From what we do comprehend from your complex document, the information provided has been misleading, inaccurate and

inadequate so far, and on the basis of this information alone, we feel that the application must be rejected.

- We would like to see the prerequisite report, on the re-examination of the light issue, as asked for by the BRE in 2010.

- Diagrams taken from a property website are not accurate enough for a robust daylight assessment. There have been no readings from the properties most affected.

It's all completely assumed, and at this point, it's INACCURATE and MISLEADING. We request Haringey Council to carry out an INDEPENDENT light assessment from the BRE (who have offered their services to do this) and demonstrate the accuracy of the report.

- We would like to see the architect's shadow modelling at summer and winter so see the true impact that a 7 storey building would have on our light
- We would like to see the developer's images of Block A from the angle of Primezone Mews as demonstrated above.

c) Inaccuracy of views supplied by the architects. Current views supplied: Two months ago, Katherine Smith of Flat 23, requested 3D models supplied by the architect and has not received these so far. The current images are wholly unacceptable and INACCURATE.

Architects have a wealth of technology available to demonstrate the size and scale of a development. Why have we, in the digital age of 2017, been presented with the images below?

We have previously asked for additional images from the view of Primezone Mews, to be supplied, and they were not forthcoming.

Haringey admit in their Core Strategy (Issue 7.1, 1.18), that they adhere to CABI's design objectives: "These form the basis of the concept of Design Issues that inform Haringey policies to support this"

By Design – Urban Design in the Planning System: Towards Better Practice" (ODPM, CABI 2000) sets out the following seven design objectives:

It is important that members of the planning committee can see proper and full evidence of the design quality of proposals, which they are being recommended to approve. Architectural models and reliable and accurate perspective drawings are invaluable.

(With advances in information technology it can be expected that in the future committees will be able to see computerised simulations of journeys around and through proposed buildings. They will be able to select viewpoints for computer generated three-dimensional images of buildings.)

NB: This was written in 2000 – 17 years later those advancements are in place and it's expected that committees use 3D technology for images of buildings. We believe you have not followed guidance in your Core Strategy where you state to adhere to CABE's design principals. 17 years on since this was written, we believe 3D modelling should be the norm. We have requested, and yet not seen them.

A local architect, Stephen Richter, has supplied such images using Google Earth. They are representative of what this could look like and we ask again, that the developer provide modern, digital, accurate 3D images to help the community see what this will look like.

Aerial views – requested from, but not supplied by the architects

Supplied views 3D modelling – a more realistic view

View from Weston Park

View from Library; missing the view of Block B

View from Ally Pally

Primezone views, requested and not supplied by the architect

Summary: INADEQUATE AND INACCURATE INFORMATION, MISLEADING INFORMATION provided by the developers.

- We would like to see accurate 3D images from the Developer's architect. We have asked and yet they have not supplied them.

d) Privacy report

- The 70 feet high building will tower above the Primezone Mews block, particularly the top floor flats.
- Bottom floor flats will not be face-to-face with Block A because of a 10 ft. wall, however the 9m proximity of the high building means the higher Block A flats will be able to view people in the ground floor flats bedrooms.
- The diagrams supplied in the Privacy Report are not accurate. They imply that there are trees blocking the view between Block A and Primezone top floor flats. (Image 1).

However in image 2, you can clearly see the trees are at the SIDE of Primezone and not along that border. So the views will be directly into each other's properties.

INACCURATE IMAGES

The developers are proposing some measures to ease this privacy issue but they do not state what they are in the privacy document. INACCURATE INFORMATION

- They are also proposing to replace the existing trees with a vertical orchard of trained fruit trees on a trellis (an espalier). These could be on the existing boundary wall owned by Primezone freeholders. Please can we see evidence to the contrary if they have received permission to build a trellis on a wall that is at risk of subsidence?

- Fruit trees on a trellis will not grow 10 feet into the air beyond a 10ft wall, unless the developer is proposing a 20ft high trellis so how does this contribute to the privacy between the properties?

- A trellis higher than the Primezone boundary wall, presents a risk of blocking even more light from the properties. There is no mention of the trellis in the daylight report.

- Trellis, as mentioned on the Crime Prevention website is one key factor in burglaries. N8 has higher than local average burglary levels and a metal trellis is as good as a ladder up a wall.

- The Local Plan (please see below) refers to the design of new developments incorporating solutions to reduce crime. The current proposal does not reduce crime but will increase the fear of crime.

Reference Quote Comment Local Plan Page 112; 6.1 SP11

Design section new developments will incorporate solutions to reduce crime and the fear of crime.
This does NOT reduce fear of crime, only increases it.

London Plan 7.6, B

Buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

Summary:

INADEQUATE INFORMATION regarding how the top floor flats at Primezone will have their privacy considered. It also puts property at risk of burglary.

e) Light Pollution Reference Quote Comment Haringey's SPD 2013, S 7.3 page 35

Light pollution is caused by obtrusive light penetrating into facing rooms or impeding the views of the night sky, causing glare or light spillage. Light pollution is a material planning consideration and a light assessment will be needed where lighting is proposed. As a general guide, applicants are encouraged to submit details of lighting schemes, including light scatter diagrams, as part of the planning application to demonstrate that the proposed scheme is appropriate for its purpose in its particular setting. The assessment should demonstrate that the potential for light pollution from glare and spillage to neighbouring properties, roads and countryside has been minimised.

Although there is no lighting that we can see, at the back of Block A, there is light spill from the rooms. We would like to see a light assessment of the whole development (assuming there will be lighting throughout)

Summary:

INADEQUATE INFORMATION

- We would like to see the light effect from 70 bedroom lights shining down on Primezone Mews
- There is no light assessment report. We assume that such a large development would have lighting and not be in darkness. This light could have an impact on the residents of the area, and on the wildlife.

2. Height in relation to the neighbourhood and context within the area.

- The proposed new blocks A and B is a development that consists of a series of square blocks, standing up to seven storeys (70 feet high) that will be built up against the boundary limits of the site. They dominate the skyline and are overbearing
- The design is unsympathetic and does not conform to the Victorian neighbourhood, which constitutes mainly 2 – 3 storey buildings as per the Urban Characterisation Document
- It is up to 40 feet higher than surrounding buildings
- There are some four-storey buildings in Haringey Park but they blend in with the area and do not dominate.
- They diminish the standing of the Grade II listed Town Hall and Grade II listed library
- They are not in line with Haringey's Local Plan Policy document, which states only two areas (Haringey Heartlands/Wood Green and Tottenham Hale), have sites that may be suitable for some tall or large buildings (see below for reference).

In keeping with the character of the neighbourhood: Reference Quote Comment Local Plan Page 112: 6.1 SP11 Design section.

Haringey has many special and unique places with historic and modern buildings of the highest quality. As well as preserving our rich heritage, the Council will also be contributing to it by making sure that it only permits new buildings of high quality that will be appreciated by future generations.

Can Haringey council demonstrate that this build will be something that people will come to appreciate for future generations?

London Plan 7.6 7.22

A building should enhance the amenity and vitality of the surrounding streets. It should make a positive contribution to the landscape and relate well to the form, proportion, scale and character of streets

Similar developments have been restricted or rejected:

- From your Site Allocations DPD; Referring to SA49: 72-96 Park Rd & Lynton Road, 72-96 Park Rd & Lynton Road; the development Guidelines state heights should be restricted to protect the amenity of properties.... And should respond to the Park Road frontage and the established rhythm.

- From HGY/2013/1282; this was REJECTED on the basis that an extra storey would detract from the nature of the conservation area and views of Crouch End

- Quote: The application shown above has been refused for the following reasons:

The proposed roof extension, by reason of its size, scale and prominent location, would be out of keeping with the design and character of the existing building, and would have adverse effect on the appearance of the property and the visual amenity of the conservation area as a whole, contrary to the National Planning Policy Framework, March 2012 and to Policies 7.4, 7.6 and 7.8 of the London Plan 2011, Policies SP11 and SP12 of the Haringey Local Plan 2013, Saved Policies UD3 and CSV5 of the Haringey Unitary Development Plan 2006 and inconsistent with the Council's Supplementary Planning Guidance SPG1a 'Design guidance' and SPG2 'Conservation and archaeology'.

In keeping with Haringey's definition of tall buildings. These new buildings dominate the skyline and tower above all other properties in the area.

Reference Quote Comment 2017 Local Plan Page 114, SP11 p6.1.18

Currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings. This is because they are close to major transport interchanges, have been designated in the London Plan as an Opportunity Area (Tottenham Hale) and an Area for Intensification (Haringey Heartlands/ Wood Green) and have existing adopted masterplan Frameworks.

Elsewhere, tall buildings are considered inappropriate to Haringey's predominantly 2-3 storey residential suburban character until shown otherwise, for example, in AAPs and UCSs.

Why are Haringey now considering this 7 storey build in an area with no direct access to major transport interchanges.

In line with your policy documents this build is considered inappropriate.

This area has not been considered as a place for high buildings in the London

Plan Urban Characterisation Document regarding Crouch End it states: The area has a very consistent and coherent building height character, which needs to be respected.

- Retain the mid rise character of the area. New developments should fit into this townscape with general building heights of between 3-5 storeys.
- Along the main streets heights could rise to 4-6 storeys
- The area is not suitable for high-rise buildings given its low to mid level PTALs, consistent mid-rise

This build in the heart of Crouch End does not respect the nature of the area, or is it keeping with 3- 5 storeys. And there are no other high rise blocks in this area.

character and conservation area sensitivities.

- Mid to high-rise buildings may be suitable in those blocks to the west where they currently exist. There must be consideration to the street scene, plot relationship and quality of landscape.

You have acknowledged the low PTAL rating.

Haringey Tall Building definition (page 114 Local Plan, SP11 p 6.1.15/16)

Haringey is characterised by predominantly low-rise (2- 3 storey) residential suburban development across the borough and 3-4 storey developments in its town centres. The exception is Wood Green town centre, where buildings within its core area range between 4-9 storeys

The Council has adopted the definition of Tall and Large Buildings which are substantially taller than their neighbours, have a significant impact on the skyline, OR are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London, as set out in the London Plan.

According to the Haringey Council Policy, these are TALL buildings and tall buildings are not suitable for this area. The 5, 6 and 7 storey blocks are out of keeping with the local context and character.

It also states: SP11 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Authority Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3.

In accordance with Haringey Policy, and in line with your definition of tall buildings, applications for tall buildings will be assessed against the following criteria:

- An adopted Area Action Plan or existing adopted master plan framework for the site and surrounding area;
- Compliance with the Development Management Policies criteria for Tall and Large Buildings siting and design

In summary:

INADEQUATE INFORMATION and CONTRAVENTION OF HARINGEY POLICY

This proposal does not enhance the setting of the Town Hall; it is built on an existing conservation area, and does not contribute to the creation and enhancement of Haringey's sense of place and identity. The development completely contravenes items in the Haringey's Local Plan Strategic Policies 2013 – 2026.

- Where can we see the Area Action Plan, Authority Monitoring Report and Urban Characterisation Study that shows that this Crouch End Town Hall development site supersedes current policy recommendations? These documents have not been submitted as supplementary documents on the planning site.
- Crouch End has not been listed in the London Plan as an area for intensification so this high, dense development must have a new Masterplan Framework, as per Haringey Heartlands/ Wood Green. Where can we see this document?

3. Density report Reference Quote Comment The London Plan Policy

3.4

The density of an urban area with a PTAL rating of 2-3 should be no higher than 170 units/h and “Development proposals which compromise this policy should be resisted.

The density quoted by the developer is 162 units /ha. This has used the entire area for the calculation. The Town Hall and the green should be removed from the calculation. Taking into account the actual area of the build, the correct calculation is 187units/ha, in excess of the London Plan recommendations.

Summary

INCORRECT and MISLEADING information from the developer. The calculation is not correct.

4. Transport, Parking, Pollution

• Cars/ Parking

There will be 48 spaces for 146 units as well as traffic from the visitors to the 67 hotel rooms.

Haringey Park and Weston Park are already oversubscribed in terms of permits/spaces available.

Where will the extra cars, not allocated bespoke spaces, park?

How will Haringey pay for the cost of the road maintenance from the extra traffic? Can the roads cope?

• Buses

The traffic survey and traffic plan fails to take into account that travel to or from Crouch End usually is via bus. TFL have asked for £450k over five years, acknowledging that the W7 is at capacity.

More buses will be required for all of the extra people.

There is no viable travel plan to cope with the 500+ extra people, and the hotel residents in an area with a PTAL rating of 2-3.

• Pollution

Pollution will not only come from the extra cars in the area, but from extra buses that TFL have stated will be needed to cope, and the proposed shuttle bus.

More buses on the road will slow down traffic. Increased and slower moving traffic will concentrate pollution, which is a risk on people's health.

Reference Quote Pollution report Section 4, page 14 of the Air Quality document:

It is disappointing to note that the development is not a car-free development, a total of 48 parking spaces and gas CHP is advised; a condition with respect to emissions from CHP is therefore required.”

Haringey requires major developments to implement travel plans and local improvements to reduce traffic.

• Haringey requires all medium and major developments to have a Construction Management Plan submitted at the

application stage

Section 4, page 14 of the Air Quality document states

In line with the measures regarding the air quality assessment and following consultation with the EHO at Haringey Borough Council, it was confirmed that an assessment of impact upon both NO2 and PM10 concentrations would need to be undertaken.

Haringey requires new developments to reduce transport emissions through the use of car-clubs, be car-free developments, an active travel plan or provision of sustainable forms of transport.

Summary

Not enough consideration has been taken into account regarding the pollution of the area, or the significant increase of traffic. Additionally the documents are also too dense and technical for non-experts to understand and Haringey are making it exceptionally difficult for people to get the information they need.

We would like to ask you to consider the following:

- Where can we see the Construction Management Plan? It is not on the list of Application documents?
- How can increased TFL buses, shuttle buses, service vehicles and more cars be in line with Haringey policy of reducing traffic?
- The Air Quality report states that the difference will be negligible extra cars, extra buses, slower moving traffic, extra delivery and maintenance traffic not make an impact

In conclusion, this new proposal does not conform to aspects of 7.4 A and B, 7.6 and 7.8 of the London Plan 2011, Policies SP11 and SP12 of the Haringey Local Plan 2013 (revised 2017), amongst many others. Haringey council have an obligation to consider previous applications that were rejected for these same reasons. They also must consider the BRE recommendation regarding light reports that were required for the previous approved build- but there is no evidence they were completed.

The developers have not provided adequate or accurate information around the build in terms of truthful images, boundary distances, privacy and light to surrounding properties. We are very concerned about the proximity and height and impact on our light and foundations of the boundary wall. We feel this is very much compromising our safety and our standard of living. The developers have supplied immensely technical documents on pollution and daylight, which are not coherent for a layperson. We feel that they have deliberately made it impossible for members of the public to fully understand the realities of

how this new development will negatively impact the area. We request you refuse permission for the proposed scheme.

Bilal Sukkar 1 Primezone Mews

Marcos A Dos Santos 2 Primezone Mews

Esther Arkin 3 Primezone Mews

Ulla Korterman 4 Primezone Mews

Veronica Fox 5 Primezone Mews

Georgina Norton 6 Primezone Mews

Rheea Aranha(owner), Victoria Roberts 7 Primezone Mews

John Hill 9 Primezone Mews

Adam Ayre 10 Primezone Mews

Stephanie Sarno (owner), Natelie Cannon and Andrew Hill 11 Primezone Mews

Tom Hughes 12 Primezone Mews

Faghma Coetzee 13 Primezone Mews

Kim Robinson 14 Primezone Mews

Archie Gormley and Sarah Balmond 15 Primezone Mews

Aoife O'Conner and Ben Collister 17 Primezone Mews

Steve Crowley and Caroline McGraw 18 Primezone Mews

Silvia and Oscar Molina 19 Primezone Mews

Melissa Kopff 20 Primezone Mews

Alistair and Alexis Hogg 21 Primezone Mews

Matthew Fielden 22 Primezone Mews

Katherine Smith 23 Primezone Mews

Jason Geller 24 Primezone Mews

Sue Walker 25 Primezone Mews

Giulia Sarno (owner), Aidan Parkinson and Isabel Silva 26 Primezone Mews

Eli Lew and Sammy Ross 27 Primezone Mews

Anthony Sarno (owner), Caroline and Chris Wiseman 28 Primezone Mews