

## Appendix 1: Consultation Responses

Stakeholder	Question/Comment	Response
<b>INTERNAL</b>		
<b>Design</b>	<p>The Revised Masterplan This proposal is for a substantially revised masterplan, with proposals for the southern half of the site; up to and including the pocket park and the block north of it on the west side of the north-south street (Mary Neuner Way / Clarendon Road) to be a detailed planning application and for the remaining northern half of their site to be in outline, and to which the Design Code relates.</p> <p>The general layout of the proposals remain a residential lead mixed use development of flatted blocks rising in height east to west and north to south, with non-residential uses on some ground and occasionally 1st floors, with employment and retail focussed towards the northern part of the site. The proposals increase the residential unit numbers and employment floorspace to reflect anticipated increased public transport accessibility and the assessment in the Urban Characterisation Study as of “central” character. Just as importantly, the form and layout of blocks is significantly broken up compared to the existing approvals, to create a greater variety of individual buildings with spaces of different characters between.</p> <p>As Design Officer, I am strongly supportive of this overall approach to the wider masterplan, particularly welcoming the less monolithic blocks, and the opportunities to create greater character and interesting public and</p>	Noted – relevant conditions included

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	<p>private spaces between buildings. The more fragmented block forms and increased vertical emphasis is a significant improvement, subject to detailed design.</p> <p>In addition, I welcome the likelihood that residential quality and amenity will be improved, with significantly fewer single aspect flats, a good distribution of ground and first floor maisonettes with their own front doors and/or private gardens as well as ground floor non-residential uses creating active frontages. Other positive aspects include the compatibility with (and protection of) the existing housing adjacent and the creation of a network of interesting, pedestrian friendly spaces that will not be car-dominated. I feel that this revised masterplan responds to the significant QRP concerns raised regarding the previous reserved matters scheme.</p> <p>The applicants propose an interesting system of elevational treatments; proportions and material choices that seek to give a unity to the facades around the spaces rather than to the blocks themselves, which I consider could be very successful. In addition, they feel that the distribution of community, retail and employment uses has a great deal of logic and appeal, and that the proposed public and private open spaces are promising.</p> <p>The Design Code This Design Code relates to part of a substantially revised masterplan, with proposals for the southern half of the site; up to and including the pocket park and the block north of it on the west side of the north-south street (Mary Neuner Way / Clarendon Road) to be a detailed</p>	

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	<p>planning application and for the remaining northern half of the site to be in outline. The Design Code relates to the Outline element only. It provides clear guidance on the intended scale and character of the individual buildings and spaces between them in the masterplan area (“The Northern Quarter”), and should ensure continuity and compatibility with the southern part of the site submitted for detailed approval.</p> <p>The code defines key distinct character areas within the Northern Quarter that support richer and more varied mix of uses, including more workspace and retail, and a busier, more vibrant area than the more residential southern quarter. It also contains more and higher tall buildings and less ground level amenity space, and will therefore depend more on successful coordination and complimentary design between neighbouring blocks both within the site and to its neighbours.</p> <p>The code enshrines the fundamental compositional principle of the development, made up of a “collage” of L-shaped blocks defining varied spaces, and the code goes on to mandate a legible, permeable public realm, composition of blocks to avoid creating a “wall of buildings”, response to the spaces they front and distinctive, contrasting tops to higher buildings. Specific code provisions ensure employment and town centre functions will sit comfortably with residential upper floors, defining a distinct base or podium and communal roof gardens. The code then describes the principles of façade articulation as detailed in the Southern Quarter; with primary, secondary and tertiary facades relating to</p>	

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	<p>the spaces they enclose, with special treatments of corners, recessed balconies etc. Finally, the code details how each individual block, each façade within those blocks and each space between them should be interpreted within the framework of rules and hierarchies described, with a series of colour coded drawings of each block.</p> <p>The Code also describes the agreed site-wide (and it is intended by the Council, Heartlands-wide) streetscape and public realm design proposals, including an agreed palette of materials encompassing public spaces to be adopted by the council and those to be retained and managed by the developer, so that they flow seamlessly from one to the other and form a robust, durable and attractive public realm. I and other council colleagues have had detailed discussions with the applicants to ensure this streetscape guidance would be acceptable on other streets and public spaces within the wider Heartlands area.</p> <p>The Design Code will have greater weight than the Illustrative Masterplan, but less weight than the Parameter Plans in ensuring reserved matters applications conform to tis outline approval (if granted).</p> <p>Officers have worked closely with the developers, their architects and landscape architects, to develop this Design Code and are hopeful that it should ensure maintenance of high quality design in future stages of this development, where the current planning application is only for outline approval. My preference would be for</p>	

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	<p>developer and design team continuity to aid in this, but we must be realistic and accept that architects are likely to change and developers could change in later phases, so would hope that the Design Code ensures that essential elements that should make it an acceptable design are not lost. An additional condition requiring retention of the current architects and design team, or approval by the Council of any changes, would be useful to ensure continued design quality.</p> <p>Parameter Plans, inc. Pattern, Form Height Bulk &amp; Massing of the Outline part of the Application</p> <p>The hybrid application is in outline for the “Northern Quarter”, defined by Parameter Plans, supported by the Design Code and Illustrative Scheme. The Parameter Plans only show the vaguest possible detail of buildable envelope applied for. The Northern Quarter is divided into abstract development plots, covering the whole site rather than describing block forms; they therefore ignore intended spaces between buildings, apart from the primary north-south circulation spine and main commercial square towards the northern end of the site. Symbols show intended approximate locations of gaps between blocks along the eastern boundary along the Moselle Walk, but otherwise the Parameter Plans do not define block forms; this is left to the Design Code and Illustrative Masterplan.</p> <p>The development plots are shown as projected up to maximum and minimum developable envelope. The maxima are for each plot; the applicants clearly state that</p>	

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	<p>their intention is that not all plots should be built to these maxima, but we need to rely on the design code and numerical quanta (of residential unit numbers and non-residential floorspace) to ensure that. In some cases, maxima represent alternative permutations. For instance, in Block H (the L-shaped development parcel in the north-eastern corner of the site), the illustrative scheme and design code show that the intended scheme is for two higher blocks in the two arms, at H1 and H3, with a significantly lower maximum height of the linking H2, but the parameter plan maxima allow an alternative with one highest point in H2. The design Code makes it clear that if H2 (the link) contains a higher building, H1 &amp; 3 (the arms) should be significantly lower, but the parameter plans alone could be read to indicate all three could be high. We need to rely on the Design Code to avoid this, which would not be acceptable, but provided the Design Code can be relied upon, that would satisfy me.</p> <p>The parameter plans also show minimum developable heights. These should probably more accurately be described as minimum-maximum envelopes; like the maximum envelopes above (maximum-maximum?), these do not account for the intended cut backs and modelling of blocks as described (and mandated) in the design code and illustrated in the illustrative scheme. I would consider this modelling essential and the massive, blocky built forms implied if the parameter plans were to be built out entirely to their maximum permitted extents to be fundamentally unacceptable. To some extent, they would be impossible as not containing enough perimeter</p>	

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	<p>to make viable residential accommodation. Modelling the maximal or minimal parameter plans in supporting documents such as the verified views and day and sunlight assessments, therefore, need to be understood as diagrammatic, not realistic intentions.</p> <p>The parameter plans are further embellished by symbolic representations of features and facilities. These include open space for public amenity, private communal amenity and children’s playspace, as well as the need for gaps in the blocks along the eastern edge of the side, beside the Moselle Walk linear park backing onto the back gardens of houses on Hornsey Park Road, an essential feature to break up the massing along this sensitive edge of the site.</p> <p>The Council agrees that tall buildings could be acceptable in principle at the northern end of this site. This has been established through the evolution of now adopted documents in the Local Plan Strategic Policies and Development Management Policies, supported by our Urban Characterisation Study that specifically identified a suitable tall building location to the western end of Coburg Road to complement the existing tall building location at Wood Green Tube and potential in the centre of Wood Green and at Turnpike Lane, to define the limits of and gateways to the metropolitan centre. The location is also more suitable as they would have little impact on existing neighbouring housing or sensitive green space; whilst it may be visible (discussed below), overlooking, overshadowing and microclimate effects would be confined to the immediate vicinity,</p>	

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	<p>which is only composed of non-residential sites. Whilst development including residential that would be affected is planned for some of those neighbouring sites, and indeed this site, they can be designed to accommodate the proposed taller buildings.</p> <p>Views of the proposed development, especially its taller buildings, have been prepared from a number of locations, as part of the Townscape and Visual Impact Assessment (TVIA) chapter of the Environmental Statement. These include those of Haringey's Local Views (as defined in the DM DPD) within which the proposals would be visible, sensitive locations such as public open space from which it could be visible and local streets approaching the site. These views were agreed in consultation with me and colleagues and are Verified Views prepared in accordance with the Landscape Institute "Guide for Landscape and Visual Impact Assessment" (GLVIA). As mentioned above, these show both the Illustrative Scheme and the theoretical maximal build-out of the Parameter Plans. I consider only the Illustrative Scheme to be realistic, but bear in mind that elements (but not the whole development) could be expanded up to the parameter plans maxima.</p> <p>Verified views are variously as Wireframe or Rendered, as agreed with me and colleagues, as appropriate to assess the significance of the impact. Rendered views show the massing of the detailed and illustrative scheme as it is composed as a series of distinct, "collaged" elements, and how the tones of brickwork, going from</p>	

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	<p>darker to lighter as height increases, support the composition of the proposals. I consider the proposed composition is attractive, avoids any appearance of excessively large and bulky individual buildings, reads as a logical part of the wider cityscape, dropping from high gradually to more contextual heights and forms a satisfying composition. I am also pleased to see that it does not interrupt or excessively intrude into any key receptors, especially Alexandra Palace on its wooded hilltop, in our key Local Views. I am therefore satisfied that the proposed tall buildings are acceptable in local and distant views.</p> <p>Impact of the proposed tall buildings on daylight, sunlight privacy and microclimate is discussed separately below.</p> <p>Detailed Scheme, inc. Pattern, Form Height Bulk &amp; Massing of the Outline part of the Application</p> <p>The hybrid application is a full or detailed application for the “Southern Quarter”, that is everything south of and including the park over the culverted Moselle, as well as Block C. Although it should be noted that the similarity of Block C to the previous approved scheme has enabled it to be started as a minor amendment to that previous approval. Full details of these blocks and the spaces between them is applied for. The detailed scheme for this southern quarter broadly carries over into the illustrative scheme for the northern quarter, but with some increases in density, height and amount of non-residential uses.</p>	

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	<p>The basic concept of urban form is to be a series of interlocking, generally L-shaped blocks. These interlock with each other, creating varied courtyard like spaces between the blocks, of a scale in width similar to a typical urban street, and relate across the main streets of the proposals in similar ways as they relate across these courts. A primary north-south street and crossing that a primary east-west park space defines the key public spaces, and these interlocking, usually L-shaped blocks address these streets and parks. Nevertheless, they also begin to define secondary public courts in the spaces between the blocks adjacent to the street, as well as private courtyard gardens deeper into and generally offset from the more public secondary spaces or “pocket parks as they are referred to.</p> <p>In the northern quarter, where the site depth is greater and context brings additional streets up to the edge of the site, the parameter plans define and the illustrative scheme shows an additional east-west street. This crosses the north-south street at a new public square, as well as street fronting relationships to streets bordering the site, especially Coburg Road to the north, treated as a major frontage. A further public park, with controlled access, would follow the course of the culverted Moselle along the eastern boundary, but blocks along its edge would not front this. The illustrative scheme shows fewer additional public pocket parks, as the greater intensity of activity and non-residential ground floor use means more of the ground level is treated as a continuously built up podium interspersed with courtyards, and the interlocking L-shaped blocks pattern manifests as a podium of even</p>	

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	<p>higher block pattern.</p> <p>Height of the proposal generally rises from low rise, 2, 3 and 4 storey where it is closest to the existing terraced houses of Hornsey Park Road to the east, particularly the south-east, gradually to 6 to 8 storeys along the southern part of the main north-south street and higher along the railway edge to the west. Height also rises from south to north across the site, from within the detailed scheme to the outline scheme. Hence, within the detailed southern quarter, the buildings on the south side of the park rise to 8 to 11 storeys, and on the north side, Block C, in detail but in many aspects of character more similar to the northern quarter, rises to 16 floors. In the northern quarter the parameter plans only permit and the illustrative scheme show heights of up to 6 floors along the Moselle Park, rising to 8-10 on the south side of the square and up to 18 storeys along the northern edge, with the possibility, if lower heights elsewhere, of up to 20.</p> <p>Excessive bulk is avoided in the modelling of the proposed blocks as a series of distinct vertical elements, with varying heights, so that although a block may be up to so many storeys, it will always only be to that maximum height for a small part of its footprint.</p> <p>The proposals avoid having a massing that would look oppressive to existing neighbouring residents, uses of the public spaces within the proposals and residents of the development due to the broken form of the proposed blocks. The appearance of the proposals from</p>	

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	<p>neighbouring existing back gardens will therefore be of a series of distinct blocks with substantial gaps between, such that its impression can reasonably be expected to be of less impact than the existing approval, which would be for a series of more continuous blocks.</p> <p>Streetscape Character  There could be a danger from an urban design point of view from a “fractured” urban form of intersecting blocks with incidental spaces between, as proposed here. This could not provide clear definition of the street, the public realm, without a clear boundary between the public realm and private spaces to the sides and rear of blocks; the “nebulous space” that so blights many mid-twentieth century “modernist” housing developments with blocks “floating” in continuous communally maintained grassland, with roads and paths wandering across this space unrelated to the buildings.</p> <p>However, I am confident that the sophisticated detailed urban design of the public realm of this proposal would completely avoid that. Blocks are designed to give priority to the spaces they enclose rather than the block itself, such that elevational treatments relate to each other around a space. Furthermore, spaces are designed to make it clear what their purpose and public accessibility should be, with strong, full height hedge boundaries, with locked gates, between public and private courtyards. The public “pocket park” courtyards also reinforce the street, they always sit on one side of the street with a corresponding building façade aligned with the street edge on the opposite side of the street, so</p>	

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	<p>that the street experience will be of a building edge to at least one side at all times, with generally a pocket park opposite.</p> <p>The “pocket park” courtyards are also given distinctive thresholds with the street, and act as residential entrance courts to the main communal residential entrances. Although elevational treatment of blocks is carried across the street, so that a façade on one side of the street relates to the three facades of the pocket park opposite, the street has a continuous identity and linear hard and soft landscaping, except for the banding of alternating surface colours to relate to the alternating pocket parks. Further street animation is secured in the location of front doors to ground floor flats and maisonettes off the street; these are generally up a few steps, with level access via the communal entrance. Although the QRP expressed doubts that the pocket parks would be distinctive enough (back in July), I am confident that the architectural expression and differences between individual courts have been refined since such that they will be a stand-out distinctive and attractive feature of the proposed development.</p> <p>The main public park is treated as an east-west public space, open continuous and a part of the public realm, with its crossing of the street treated as a special place. The park is also animated with residential front doors to ground floor flats and maisonettes, and more importantly with public ground floor uses, generally community uses, opening off the park.</p>	

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	<p>The proposals also establish a network of more private courts, gardens and paths, behind controlled access gates that will only be accessible to residents and for maintenance. This contributes to private amenity space, especially in the northern quarter.</p> <p>In the southern quarter, this also makes a significant contribution to cycle access and parking. The proposals include significant amounts of underground parking, taking vehicles (and most refuse storage) away from disturbing the streets and spaces of the site. In the southern quarter, this is a semi-basement, in the northern quarter this is a full basement under most of the site, and accommodates most cycle storage as well, apart from small amounts of visitor cycling by entrances. This is likely to be less convenient for residents, who are more likely to use a cycle if it does not require them to go out of their way from the flat door to the street, but it an inevitable consequence of the higher density of the northern quarter. However I the southern quarter only some cycle storage is in the basement; most can be accommodated “at grade” closer to and visible from some residents flats, in cycle stores tucked between the back of blocks and the site boundaries. These will be accessed from a loop of “back alleys”, gated and providing access for maintenance and a separation between flats, their gardens and the existing neighbours. Although the QRP expressed doubts about this arrangement, I think that as part of a variety of provision options (along with longer term basement and beside-entrance visitor cycle parking), this represents a good provision of cycle storage and a convenient “back alley”</p>	

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	<p>route that incorporates convincing security provisions.</p> <p><b>Elevational Treatment and Fenestration</b>  A brick based architectural materials palette is used throughout, but with variations based on a sophisticated composition. This is as a series of contrasting elevational treatments that relate to the corresponding facades that enclose a single space, and contrast with the other facades that form a block. As part of this, a particular colour brick will be combined with a particular fenestration pattern and detailing of window reveals, brick panels, pilasters, cornices etc. and balcony design around a space. Particular elevational treatments are repeated across the site, but distant and not visible from each other, so reminders of other parts of the development will occasionally appear elsewhere. This will make a significant contribution to giving each individual courtyard, and therefore residents' homes, distinctiveness and individuality, within a consistent language across the development.</p> <p>Balconies in particular contribute to elevational composition; generally recessed balconies are used, with projecting balconies only sparingly to support elevational composition; corner recessed balconies especially, with a brick pier or column in its corner prioritising one elevation over the other in support of the elevational composition, emphasising to which space each elevation addresses. Balustrades are generally open metal, chosen to support the generally vertical fenestration, but designed to inhibit angled views and therefor provide residents with privacy and some screening, except from</p>	

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	<p>rarer direct, straight-on views.</p> <p>The elevational systems are further refined. A hierarchy of most significant, intermediate and least significant elevations is established by reducing the amount of embellishment, of patterning in the brickwork etc., depending on the significance of the elevation. So main elevations facing the street, significant spaces, containing communal entrances etc. are made the most significant, and flanks, least viewed courtyard elevations, and especially those onto private courtyards and backing onto a boundary, as the lowest hierarchy and plainest elevation, yet still with fenestration and sufficient embellishment to make it recognisably of that family.</p> <p>Yet more refinement comes from gradation of floors in the elevational treatment, which also often recognises gradation of function and layout. Bases of buildings, either just the ground floor (generally in lower rise buildings) or both ground and first (generally taller) are given different fenestration and brickwork patterning, with larger, often double height windows, and a distinct “cornice” (of modern, minimalist interpretation; often formed from brick banding), to visually separate the base from the main bulk, the “middle”, of the elevational composition. This is an accepted and recommended elevational composition technique that gives a greater sense of human scale, with the ground level closest to the pedestrian, relatable to, and more appropriately designed. It also frequently responds to functional realities, with different, non-residential uses generally located on ground floors, and even where all residential,</p>	

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	<p>there are generally at least some ground and first floor maisonettes.</p> <p>Tops of the taller buildings are also given distinctive, contrasting elevational treatment, also often in response to different function. Tops of blocks cut away gradually as individual elements are stopped at lower floors, to create a variety of private and private communal roof terraces, and the highest parts of the higher blocks are generally laid out with further larger 2 storey maisonettes, benefiting again from larger roof terraces and expressed in larger, often double height window openings. In some of the highest blocks (especially in the outline northern quarter), there is a material shift to a lighter brick. The purpose and effect of this is to lighten the tops of the taller buildings, as well as to produce more satisfying elevational composition.</p> <p>The fenestration patterns that vary in response to distinctive courtyard identities are nevertheless to be characterised by generally a strongly vertical emphasis. This has been repeatedly shown to give the most elegant elevations, responding to human scale and the shape of the human body, and established by precedent such that it is one of the defining features of the “London Vernacular”. The architects have also thought deeply about how window shape and size best creates well illuminated and at the same time functional rooms, especially that whilst vertically proportioned windows can give the greatest light penetration into deep rooms, more horizontally proportioned windows provide better light distribution to wider rooms and greater flexibility in</p>	

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	<p>furniture layout. Therefore the various fenestration patterns are to be supplemented with patterned brickwork in different patterns appropriate for the elevational composition used (in that courtyard) to create vertical proportions where a more horizontal window is appropriate and to further embellish elevations in accordance with the hierarchy principle described above. The elevational treatment and materials palette of predominantly brick with contrasting feature bricks picks up also on local precedent and the local vernacular of Wood Green and its surroundings. Particular examples include the Noel Park estate with its expressed gables, chevron patterns and bands / patterning with blue and green glazed bricks, and the Campsbourne Cottages estate with its bands of projecting and canted bricks. The palette also picks up on the predominance of red bricks in this area, with occasional contrasting buffs and browns to gables, flanks and rears. This is to be welcomed as establishing local connections, as well as welcoming the use of brick for its durability and flexibility.</p> <p>Daylight, Sunlight and Privacy / Overlooking of Neighbours</p> <p>Of relevance to this and the following two sections, Haringey policy in the DM DPD DM1 requires that:  “...D Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The council will support proposals that:  a. Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent</p>	

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	<p>buildings and land;</p> <p>b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...”</p> <p>The applicants have provided Daylight, Sunlight and Overshadowing section of their Environmental Statement, on the effect of their proposed development on potentially affected neighbours. This has been prepared in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (2nd Edition, Littlefair, 2011) , known as “The BRE Guide”. Their assessment examines the effect of their proposed development on the neighbouring houses on numbers 59 through to 171, odd, Hornsey Park Road, which back onto the site to the east and overlap a short way to the south and a longer distance to the north. They have also assessed their impact on the nearest residential accommodation on Mayes Road and Coburg Road, a moderate distance to the north east of their proposed development.</p> <p>They have not assessed their impact on non-residential buildings. It would have been preferable for a considered assessment of some of these, where appropriate. Many employment uses have a reasonable expectation of daylight, as is mentioned in the supporting text to our Development Management DPD policy DM1.</p>	

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	<p>However, the location is accepted as a Growth area and Area of Intensification in adopted Local plan documents, so those existing employment uses cannot have a reasonable expectation to be insulated from change and intensification. Existing residents, on the other hand, should not be expected to lose significant proportions of their existing daylight to living rooms, kitchens and bedrooms, or sunlight to south facing living rooms or private external amenity areas.</p> <p>The changing nature of the location suggests there might also be a case for assessment of those neighbouring sites that have been identified as also suitable for development and intensification, to assess the impact of this proposed development on potential future neighbouring developments. However, the emerging nature of these proposals makes it understandably difficult for this, as essentially the first major development in the Heartlands areas. Had any neighbouring sites been granted planning permission, then those proposals should also have been assessed, and we have been telling potential applicants for neighbouring sites they need to consider the previously approved scheme for this site in the design, including daylight, sunlight and overshadowing, on their proposals.</p> <p>In the absence of any approved proposals for neighbouring sites at the time this application was submitted, the applicants could have obtained outline proposals for neighbouring sites, without knowing whether they would be approved and implemented. As it happens, two neighbouring sites (Land at the Chocolate</p>	

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	<p>Factory and Parma House, 5 Clarendon Road; HGY/2017/3020 and Land off Brook Road and Mayes Road; HGY/2017/2886) submitted planning applications a couple of weeks before this application. However, I do not consider those applications were sufficiently far ahead of this application, nor can either be described even yet as resolved applications, so I do not consider it would have been reasonable for those proposals to be assessed.</p> <p>Alternatively, these applicants could have assessed a reasonable extrapolation of their proposals on neighbouring sites; normally essentially a mirrored scheme adapted for site constraints. However, the northern part of this application, the part that borders the likely neighbouring sites, is in outline in this application. Therefore reserved matters proposals for this application, as well as whatever is proposed for neighbouring sites, can still adapt to accommodate neighbours as their concrete proposals come forward. The outline proposals, design code and illustrative scheme for this site allow sufficient flexibility, in my view, to accommodate a variety of similarly scaled proposals for similar uses on neighbouring sites.</p> <p>In particular, I would note that these proposals accommodate a widening of Coburg Road into a boulevard. Neighbouring sites on the north side are also being told by us to similarly widen the road. This will allow for increased daylight and sunlight penetration as well as a broader, more proportionate scale to this street, who's western end is identified in our tall buildings</p>	

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	<p>assessment (in DM DPD DM7) as a site suitable for greater height.</p> <p>The applicants' assessment considers the detailed proposals for the southern quarter with both the illustrative scheme and the full maximum build out of the parameter plans, even though I would consider a full build out of the parameter plans to be unreasonable. Their assessment finds that the Vertical Sky Component (VSC) to a number of windows to habitable rooms in neighbouring dwellings would drop below the BRE Guide recommended level (27%) to a noticeable degree (&gt;20%), but not a majority of neighbouring windows. Neighbouring houses are closest to the application site against the southern quarter, where the application is in detail, and backing onto this most houses have one or two noticeably affected windows, although not generally much above the BRE Guide assessment of a minimum noticeable loss. It should also be noted that the 27% VSC recommended guideline is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. The applicants also assess Daylight Distribution in the neighbouring dwellings, and find that some rooms lose noticeable amounts of daylight by this method, but generally different rooms (often in different houses) to those that would lose noticeable VSC. Again, the loss is not usually much above the minimum noticeable.</p> <p>North of the proposed park, the neighbouring existing</p>	

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	<p>houses on Hornsey Park Road are further from the application site boundary and have long back gardens. Here they back on to the Northern Quarter, in outline in this application, and the applicants have assessed the effect of both their “Illustrative Scheme” and a theoretical (but impossible) maximal build-out of the Parameter Plans. If the latter, although impossible, were built, there would be significant loss of daylight to houses in Hornsey Park Road, as well as to flats in Umoja House and above the public house at 83 Mayes Road, despite it being a considerable distance away from the site. However very few noticeable losses of VSC would occur, at substantially lower levels of loss, with the more realistic Illustrative Scheme. The effect on Daylight Distribution north of the proposed park is only noticeable with a maximal build-out of the Parameter Plans.</p> <p>A number of neighbouring dwellings in Hornsey Park Road, but none elsewhere, have living rooms that face within 90° of due south that would lose some sunlight due to this development. This factor seems unaffected by whether the proposal is the Illustrative Scheme or maximal build-out of the Parameter Plans. This probably illustrates that the neighbouring windows are extremely susceptible to loss of sunlight from virtually any development on the application site, due to them being very close to facing due east across what is currently a clear site. By contrast, the loss of sunlight to neighbouring private outdoor amenity spaces (generally back gardens) is not significant, except in a few instances of the unrealistic implementation of the maximal build-out of the Parameter Plans.</p>	

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	<p>This site also benefits from an existing planning permission, which would also cause some loss of both daylight and sunlight to existing neighbouring dwellings. This permission could be implemented at any time and would also have an impact on daylight and especially sunlight to neighbouring dwellings. There were also until recently two huge gasholders on the site, which when full, up until the 1980s, would have obscured significant amounts of daylight and especially afternoon sunlight to neighbours.</p> <p>I am therefore content that the impact on daylight and sunlight of the proposals in this application on neighbouring existing dwellings is not significantly, if at all, above levels that should be expected in this area of intensification, when compared to the existing permissions and previous industrial buildings on the site.</p> <p>Daylight, Sunlight and Privacy / Overlooking Within the Development</p> <p>The applicants have provided Daylight, Sunlight and Overshadowing Reports on their proposed development, prepared in accordance with council policy following “The BRE Guide” mentioned above.</p> <p>The applicants’ report assesses a sample of the habitable rooms within the proposed development, including living rooms, living-dining-kitchens, separate dining-kitchens, bedrooms and studio flats. It seems to me that the sample covers a range of room types and</p>	

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	<p>likely day and sunlight levels across the site, but with a bias towards the rooms likely to suffer from the poorest natural light levels, without assessing all of the plan conditions likely to be problematic. I am not concerned that the applicants are “hiding” any cases likely to be significantly worse than those assessed, but I am also not clear whether the sample tested can be considered a representative sample. I do not therefore consider it is possible to make a statistical analysis of the levels of daylight and sunlight achieved, as that would be unduly pessimistic of the proposal.</p> <p>They have assessed both the detailed proposals for the Southern Quarter and the Illustrative Scheme proposals for the outline Northern Quarter, with a similar number of rooms assessed in each. Probably a slightly larger proportion of rooms have been assessed in the southern quarter as the northern quarter contains higher rise buildings. It does not add anything to assess multiple floors when similarly laid out lower floors have been shown to achieve acceptable levels.</p> <p>I consider that a reasonably high proportion of rooms assessed in the southern quarter (84%) achieve acceptable daylight levels, and an acceptable 77% within the outline Northern Quarter. I am less concerned about the daylight levels achieved in the outline scheme as there remains an opportunity to modify the design, with options as simple as enlarging windows, to achieve acceptable levels in more rooms. There may still be opportunities to improve daylighting to the southern quarter in detailed design too. I am also mindful that the</p>	

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	<p>sample is representative and especially in the northern quarter where buildings are generally higher, a larger proportion of rooms will receive better daylight but have not been tested.</p> <p>However, an initially disappointing 38% and 34% of those tested in the southern quarter and 24% and 48% in the northern quarter would achieve the BRE Guide sunlight recommendations for the whole year and the summer months respectively. This further demonstrates the difficulty of achieving good sunlight levels to more built-up urban sites to meet the recommendations of a BRE Guide primarily based on a lower density, outer suburban housing model. Both the BRE Guide itself and the GLA Housing SPG acknowledge that standards should not be applied rigidly, with the Housing SPG going on:</p> <p>“2.3.47 BRE guidelines<sup>147</sup> on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan’s strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London”.</p> <p>A further mitigation for the relative lack of sunlight to living rooms in this proposed development can come</p>	

Stakeholder	Question/Comment	Response
	<p>from the plentiful access to well sunlit external amenity space in close proximity to dwellings in this development. There is a generous range of different external amenity space. All flats and maisonettes have access to; a private garden or balcony, one or (usually) more than one private communal garden or roof terrace shared just with other flats within their own block, generous doorstep threshold “pocket parks”, a number of varied public outdoor amenity spaces such as the proposed park, Moselle walk and public square and close proximity to existing public parks, especially Alexandra Palace Park just west of the site.</p> <p>The applicants have also assessed all the public, private communal and private amenity spaces within the proposed development for sunlight access. Sunlight levels have been assessed and contours of 2 hour access drawn for each space at the spring solstice and summer equinox. The BRE Guide recommends that “at least half of the amenity areas...should receive at least 2 hours of sunlight on 21st March” (the spring equinox). The applicants propose that residents are more likely to appreciate sunlight in the summer months, which the summer solstice plans show. An impressive 92% of all the different amenity spaces receive at least 2 hours sun at the summer solstice, and a good performance of 65% of all amenity spaces achieve the BRE Guide recommended 2 hours at the equinox.</p> <p>In particular, the sunlight study shows that in proposed new park across the centre of the site 82% would receive direct sunlight for 2 hours at the spring equinox, 97.8% at</p>	

Stakeholder	Question/Comment	Response
	<p>the summer solstice. It is true that the area immediately in front of blocks A4 and B4 are the points that would not receive sunlight, but these are intended as footways not sitting out space and the landscaping and planting pattern can accommodate this. Otherwise, this space has exemplary sunlight access. This answers a strong concern expressed by the QRP.</p> <p>It is instructive to note which spaces are less sunny at the equinox, and those few that get less sun at the solstice. These appear to be mostly lower level rooftop gardens within the Northern Quarter, where presumably when they are not being overshadowed by a taller building immediately adjacent, another near neighbour's shadow intrudes. As residents generally have access to a variety of different private communal spaces, especially roof gardens in the northern quarter, it should be possible to provide appropriate landscaping to make these spaces different and interesting in their own right, if changes in reserved matters cannot bring more sunlight into them. Notably the levels of sunlight reaching sensitive spaces such as the public square, despite being surrounded by taller buildings, is an acceptable 55%at the equinox and 99% at the summer solstice.</p> <p>Microclimate, especially Wind (Downdraft) The applicants' consultants have assessed the effect of the proposals on wind, looking for places where there might be Downdraft caused by wind hitting buildings (particularly tall or wide buildings) and being forced down to ground, or funnelled between buildings, creating uncomfortable outdoor environments. Wind levels have</p>	

Stakeholder	Question/Comment	Response
	<p>been assessed in a wind tunnel test of a model of the proposal, within its context, both with and without an estimation of future development on neighbouring sites, according to expected wind levels at different times of the year, in accordance with industry best practice. Wind levels found are categorised according to the “Lawson Criteria for Pedestrian Comfort and Safety”.</p> <p>The assessment found most of the public realm around and within the proposed development and all of the lower level external private amenity spaces would fall into Lawson Criteria C4 (comfortable for Long Term Sitting) or C3 (comfortable for Short Term Sitting or St) most seasons. There is just one point that would be C2 (comfortable for Standing and Strolling) in winter and spring; at the very north-east corner of the site at the junction of Coburg Road and Silsoe Place. There are two points that would be C2 (comfortable for Standing and Strolling) in winter only; at the very north western corner of the site, junction of Coburg Road and Western Road, and at the midpoint of the narrow east-west street between the Main Square and Western Road.</p> <p>Two of these locations are not ones where it is expected people will want to sit or stand, but will expect to walk. Notably most of the Main Square and most other outdoor amenity spaces are mostly in C4 most or all of the year, so would be suitable for outdoor seating and therefore as use for café tables, markets etc. The space at the corner of Coburg Western Road is intended as a sitting out space for a public house, and it will be necessary to introduce some mitigation measures to reduce the wind</p>	

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	<p>effects here.. These can be introduced at Reserved Matters stage.</p> <p>This is a much better microclimate performance than many other higher rise projects including Apex House, Tottenham, where Lawson Criteria indicated places which would be unsafe for walking by less able people, and have had to introduce extensive mitigation measures. I would consider this satisfies concerns from the point of view of the suitability of the site for tall buildings from a microclimate point of view, and also the QRP concerns.</p> <p>The microclimate assessment also considered balconies and accessible external roof terraces, in each case on the highest levels of the relevant buildings. It found that all such private amenity spaces fell in C3 or C4. Residential Accommodation Standards within the Proposal, inc. Aspect</p> <p>One of the driving forces behind this revised masterplan and site layout is to improve the quality of residential accommodation. All flats in the approved scheme met minimum room and flat sizes set by the Nationally Described Space Standards and London Plan, and in this new proposal, that remains the case. But there has been an emphasis on further improving the functionality of the flat layouts and providing better quality, with better daylight, more flats with dual aspect and</p> <p>The interlocking L-shaped block plans proposed allow the proposals to significantly increase the proportion of Dual Aspect flats from 23% in the previously permitted</p>	

Stakeholder	Question/Comment	Response
	<p>scheme to 60% in this proposal, which is a substantial improvement and to be welcomed. However, it is an inevitable consequence of the L-shaped block layout and additive, collaged block composition, leading to deeper plan lower floors, that there are some North Facing Single Aspect flats in the proposals. These only amount to 6.3% of the total number of flats in the whole proposal (including the Illustrative Scheme), but include 8.6% of the detailed Southern Quarter, as they are concentrated on lower floors. They do benefit from looking onto larger landscaped amenity spaces, but it would be preferable if this could have been avoided.</p> <p>Ground and first floor maisonettes are used extensively along the main street. These have a number of benefits; they add to the number of family sized units in the development, making for a better mix, they add to the definition of a distinct base aiding the architectural expression, and they aid in privacy to residents closest to the street, avoiding or reducing the need for ground floor bedrooms facing the street. The QRP suggested that they could be better located onto the private courtyard gardens; this would allow children, in what are more likely to be inhabited by families with children, to access safe outdoor playspace on their doorstep. However, they still can do this via the internal block circulation, and the additional advantages listed above outweigh, to me, this slight disadvantage.</p> <p>Conclusions This is a challenging proposal, but a hugely important site within Haringey and one that will be important to</p>	

Stakeholder	Question/Comment	Response
	<p>London as a whole. The proposals are seeking to create a high density residential neighbourhood, especially by the standards of a suburban district like Wood Green, albeit one with inner London characteristics, excellent public transport connections and a vibrant Metropolitan Centre. It is also a proposal that seeks to create a vibrant, urban environment, with a significant amount of employment, as well as shops, eating and drinking places, entertainment, community facilities, recreation spaces etc.; all the accoutrements of a holistic, sustainable community.</p> <p>It is also a proposal with a bold and challenging architectural approach, that seeks to embrace the “New London Vernacular” brick based, block pattern architectural approach of recent years but go beyond that to create neighbourhoods with greater variety and interest than many overtly formulaic developments of complete city blocks, forming boring streets with courtyard landscaped spaces hidden away behind, enclosed and echoing. Panter Hudspith seek to bring some of the spirit of the meandering, mysterious Mediaeval City or Italian Hill Town, where views and townscape unfold, surprise and delight, rather than laying it all out as a one-liner.</p> <p>I am excited by the prospect of this proposal, and am confident that it responds to the difficult challenges of this development, in a distinctive, appealing and successful manner. I am happy that earlier QRP concerns raised have been responded to or shown not to be of concern. I am confident that thanks to the</p>	

Stakeholder	Question/Comment	Response
	<p>elevational composition, quality of public spaces and detailing, secured in the detailed scheme or through the clear and unambiguous rules in the Design Code, there will be a feeling of Human Scale in and around even the highest buildings. I am happy that the Day and Sunlight Assessments and Wind Microclimate Assessment show the tall buildings and block patterns will create comfortable and successful public spaces. I am confident that the quality of accommodation will be high, with a large number of dual aspect homes and particularly good quality external private amenity spaces.</p> <p>Finally, I would say that this scheme should be a significant addition to the richness and variety of spaces, streets, squares and parks of Wood Green, contributing to stitching the area together, transforming an area that is currently alienating and hostile to pedestrians into an area beginning to be welcoming, safe, friendly and intriguing. It should help to extend and enliven the town centre, form a marker and exemplar of quality for other developments in the area, link Wood Green better to the railway line and the neighbourhoods and parks to its west, particularly Alexandra Palace and its wonderful, huge park, and contribute to bridging the gap between the east and west of The Borough.</p>	
<b>Transportation</b>	Transport and highways	<p>Transport and highways comments are incorporated in full in the main body of the report.</p> <p>Noted and appropriate conditions and section 106 clauses included</p>
<b>Pollution Control</b>	<b>Air Quality</b>	Noted. Relevant recommended

Stakeholder	Question/Comment	Response
	<p>The development site is adjacent a main road of air pollution concern, Mayes Road / Hornsey Park Road; a major route in Haringey for which both monitoring and modelling indicate exceedances of the Government's air quality objectives for nitrogen dioxide (NO2). The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ) and is committed to being a 'Cleaner Air Borough', working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. Whilst the proposed development will introduce new exposure adjacent this main road through Haringey, the proposed residential units are located away from the Mayes Road and Hornsey Park Road. The Masterplan for the site reveals the pedestrianisation of Coburg Road, realignment of Mary Neuner Road to allow vehicular access to the basement car-parks and Clarendon road / Western Road will be a main road through the development site. A Gas Pressure Reduction System (Gas PRS) and Electrical sub-station are located to the East of the development site. It is proposed to relocate the Gas PRS elsewhere on the site, although no further detail on this is provided. At the basement / ground floor level of each residential block there is an Energy Centre and / or a Plant- Heating room and in some blocks an electrical sub-station is shown present on the plans.</p> <p>There are two Energy centres proposed for the site, one in the NE of the site (15-20 MW) and the other to the SE of the site (6-7 MW gas boilers), supplying 'site-wide heat network by a Combined Heat and Power (CHP)</p>	<p>conditions included</p>

Stakeholder	Question/Comment	Response
	<p>together with high efficient gas boilers providing for the seasonal changes in space heating'. The energy assessment states ... 'It is expected that an Energy Centre will be located in the south of the development to be nearest the first phase of the build. A larger second Energy Centre can be located in the North where the density of the development is greater and where the geography is preferable. The north Energy Centre allows for future connection and provision to provide heat to the wider area.' Section 3.33 – 3.38 of the Energy assessment is in reference to the desired Wood Green Area De-centralised Energy Masterplan which 'should have a 28MW gas boiler capacity and 5.3MWth gas CHP capacity.'</p> <p>It is further noted that the SE Energy centre 'may / could' be demolished in the future, if future connection to the desired Wood Green DEN occurs. Section 6.22 – 6.25 details the phasing scenario for the Energy centres and CHP / Gas boilers.</p> <p>An Air Quality Assessment &amp; Air Quality Neutral Assessment (Appendix 9 – Environmental Statement) has been submitted along with the planning application to assess the air pollution impact of the proposed development. The main air polluting operations associated with the entire site include 1,697 car parking spaces and associated traffic movements, site wide gas boilers and CHP across the proposed Energy Centres. In addition, TfL have requested that two bus routes (230 and 67) are extended into the site, along with a bus turning area and a minimum of 4 bus stands.</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="571 235 1356 410">Diffusion tube monitoring has been carried out to the perimeter of the development site. The results indicate that the Government's nitrogen dioxide (NO<sub>2</sub>) objective is exceeded at the Hornsey Park Road location and the Mayes Road location.</p> <p data-bbox="571 456 1213 521">The London Plan, Policy 7.14 states that new development should:</p> <ul data-bbox="604 565 1373 1398" style="list-style-type: none"> <li data-bbox="604 565 1373 922">• minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans</li> <li data-bbox="604 967 1314 1068">• promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;</li> <li data-bbox="604 1114 1373 1252">• be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).</li> <li data-bbox="604 1297 1339 1398">• Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>The proposed site-wide development should have consideration to the emerging London Plan.</p> <p>The Air Quality Assessment submitted is for the detailed element of the proposed development only; being the southern part of the site. Other concerns with the AQ assessment for the detailed and outline application include:</p> <ul style="list-style-type: none"> <li>• Choice of model used</li> <li>• street canyons were not included in any of the modelled scenarios as the buildings are considered not to be tall (section 9.2.18); many of the taller blocks are located in the Northern part of the site; however modelling was undertaken for the detailed application (the southern part of the site) only.</li> </ul> <p>Page.74 of the Design and Access statement (October 2017, Panter Hudspith Architects) indicates the scale and heights of the proposed development. The height of the blocks for the site is capped at 19 storeys, which are primarily located to the Northern part of the site. ADMS Urban is considered a more appropriate model to use to more accurately model the AQ impact of entire proposed development.</p> <p>There is no consideration of the collective AQ impacts / emissions from adjacent developments including:</p> <ul style="list-style-type: none"> <li>• Coronation Sidings and Western Road Depot,</li> <li>• Cultural Quarter development site (the Chocolate</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>Factory),</p> <ul style="list-style-type: none"> <li>• Bittern Place development site and</li> <li>• Iceland Site development site</li> <li>• The height and location of the stacks/ flues serving the Energy centres. The AQ assessment has included 4No. stack heights of 3m above the roof height of block A4. Block A4 is the proposed location of the SE energy centre, of 7 MW. No consideration has been afforded to the larger energy centre proposed for the north of the development site. The Energy assessment indicates that the stack heights are '2m above roof height of the tallest building.'</li> </ul> <p>Air quality modelling should consider and demonstrate the AQ impact of the proposed site wide Wood Green DEN, which should be as a minimum, '28MW gas boiler capacity and 5.3MWth gas CHP capacity.'</p> <ul style="list-style-type: none"> <li>• No detail has been afforded to the CHP and gas boilers size and model. Selective Catalytic Reduction (SCR) will be required to reduce the emissions from the CHP plant.</li> <li>• The masterplan plan indicates Energy centres below many of the residential blocks (both in the south and north of the site) and commercial units. The emissions from these should also be included in the modelling.</li> <li>• The future year of the southern phase of the development modelled is 2032 only, stated as the year of completed development. As an example, the completion of Phase 1 should be modelled, the</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>impact during the duration of Phase 2 (northern development) of the site, the bus route extension and bus stand impacts, emissions from the commercial, retail and leisure parts of the development and the AQ impact on the proposed nursery.</p> <p>The outline application for the northern part of the site is fairly detailed and so the AQ impacts of the entire Gas works development site, including nearby junctions, developments - including site wide gas boilers and CHP should be re-modelled using ADMS- Urban. The results should include an indication of source apportionment and detail the re-circulating flow around the proposed tower blocks and AQ pollution impacts of the street canyons. Consideration must also be given to the emerging London Plan and specific AQ policies.</p> <p>Following discussions regarding the above a range of conditions are proposed.</p> <p><b>Land Contamination</b></p> <p>The following comments are made with consideration of the environmental information that has been submitted together with apposite conditions.</p> <p><b><u>Contaminated Land:</u></b></p> <p>The full application site (outline (Northern part) and</p>	<p>Noted - recommended conditions included.</p>

Stakeholder	Question/Comment	Response
	<p>detailed (southern part)) is for mixed use comprising of 1,697 residential units up to 19 floors high / 109m AOD in height and 425 parking spaces of which 170 are for disabled use, a nursery, cafes and retail, a gym and light commercial use. It is noted that the application proposes that Coburg road is closed completely to vehicles and is fully pedestrianised.</p> <p>At the current time of consideration of this planning application, there are outstanding contaminated land concerns with regard to the whole gas works site.</p> <p>The current state of the entire site is that it has been remediated to National Grid's own Commercial state, known as Open-Storage end-use, which is not suitable for the proposed residential end-use. The acid tar pits to the W of the site, adjacent the railway land, identified contaminated hotspots in the made ground and 2No. of the gas holders have had the associated contaminated material removed. The third gas holder on the site has not been fully remediated. It is this holder that remains outstanding. It is some 10m deep with asbestos containing material (ACM); which is likely to be waste from buildings previously demolished on site. Some of the ACM has been removed and a concrete cap has been put in place, however a considerable amount of ACM remains in situ. This gas holder will be below proposed residential Block B3 and surrounding proposed amenity / open space land.</p> <p>The main concern is the proposed piling works which are required for the block and the risk to human health from</p>	<p>Noted – recommended conditions included</p>

Stakeholder	Question/Comment	Response
	<p>these piling works.</p> <p>Appendix 12 of the Environmental statement concerns the Land Assessment. The last paragraph of Page 22 states:</p> <p><i>'However, there is a requirement for additional site wide intrusive investigation works to be completed in order to quantify potential risks to residential human health receptors likely to be present during the demolition / construction phases and future users (residents) upon completion of the development works. Further intrusive site investigation would determine the presence, location and concentrations of any existing unacceptable solid and/or groundwater contamination and confirm the extent of any remedial works required.'</i></p> <p>An outline remedial strategy is then proposed <i>'in order to address potential contamination at the Site to ensure the site is suitable for use under a residential end use. The strategy is subject to refinement in line with the requirements of CLR11 following completion of further Site Investigation and consultation with the Environment Agency and LBH.'</i></p> <p>I recommend the following conditions are applied to both the Outline Permission application and the Detailed Permission application</p> <p><b><u>Piling Works:</u></b></p> <p>In one of the gas holders there remains at depth</p>	

Stakeholder	Question/Comment	Response
	<p>asbestos materials and other contaminants, such as lead and hydrocarbons. At the time of writing a concrete capping in place to prevent risk to human health. Any piling works on/in the environs of proposed residential Block B3 and surrounding proposed amenity / open space land has the potential to cause exposure of the contaminants in the gas holder and so a risk to human health.</p> <p>In addition to the concerns raised by Thames Water, a further condition is recommended.</p> <p>A further condition is recommended in respect of the electricity sub-station.</p>	<p>Noted – recommended conditions included</p>
<b>Waste Management</b>	<p>Wheelie bins or bulk waste containers must be provided for household collections. Bulk waste containers must be located no further than 10 metres from the point of collection. Route from waste storage points to collection point must be as straight as possible with no kerbs or steps. Gradients should be no greater than 1:20 and surfaces should be smooth and sound, concrete rather than flexible. Dropped kerbs should be installed as necessary.</p> <p>If waste containers are housed, housings must be big enough to fit as many containers as are necessary to facilitate once per week collection and be high enough for lids to be open and closed where lidded containers are installed. Internal housing layouts must allow all containers to be accessed by users. Applicants can seek further advice about housings from Waste Management if required.</p>	<p>Noted – all recommended conditions included</p>

Stakeholder	Question/Comment	Response
	<p>Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours.</p> <p>All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them. If access through security gates/doors is required for household waste collection, codes, keys, transponders or any other type of access equipment must be provided to the council. No charges will be accepted by the council for equipment required to gain access.</p> <p>Waste collection vehicles require height clearance of at least 4.75 metres. Roads required for access by waste collection vehicles must be constructed to withstand load bearing of up to 26 tonnes.</p> <p>Adequate waste storage arrangements must be made so that waste does not need to be placed on the public highway other than immediately before it is due to be collected. Further detailed advice can be given on this where required.</p> <p>Having looked at the waste strategy proposed and also understanding that a meeting had taken place with colleagues from LBH waste management team where it was accepted that the proposal put forward it was agreed that compacting waste was an option it is still preferred that the developer adopts the current guidelines provided by Haringey Council as a tried and tested method within the borough.</p>	

Stakeholder	Question/Comment	Response
	<p>Please note the following points as specific areas of concern.</p> <ul style="list-style-type: none"> <li>• Compacted bins cause frequent damage to bins that occurs regularly due to the additional weight when used in operational conditions (Haringey would not provide waste receptacles under the current terms and conditions of the hire agreements currently being used).</li> <li>• Compacted bins have a Health &amp; Safety element of concern for operatives as H&amp;S guidelines state that the lifting and movement of weight is whatever the individual feels comfortable with.</li> <li>• Designs of lifting equipment attached to waste vehicles can differ and the lifting weights can be lower than 500kgs and is dependent on stock in use at time of operation.</li> <li>• Haringey no longer use 360L food waste receptacles due to weights proving difficult to manage. 140L &amp; 240L are now widely adopted.</li> <li>• Bulky waste collection service is no longer free of charge.</li> <li>• Some form of pest control system would be of benefit outlined in point 7.2</li> <li>• Commercial waste must be stored separately from residential waste arrangements for a scheduled waste collection with a Commercial Waste Contractor will be required.</li> <li>• The business owner will need to ensure that they</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>have a cleansing schedule in place and that all waste is contained at all times.</p> <ul style="list-style-type: none"> <li>Commercial Business must ensure all waste produced on site are disposed of responsibly under their duty of care within Environmental Protection Act 1990. It is for the business to arrange a properly documented process for waste collection from a licensed contractor of their choice. Documentation must be kept by the business and be produced on request of an authorised Council Official under section 34 of the Act. Failure to do so may result in a fixed penalty fine or prosecution through the criminal Court system.</li> </ul> <p>The above planning application has been given a RAG traffic light status of AMBER for waste storage and collection because it is unclear if arrangements have been made for the storage of all waste receptacles as stated above.</p>	
<b>Sustainability</b>	<p><b>Energy – Phase One</b></p> <p><i>Lean</i> The measures set out are acceptable for energy efficiency measures.</p> <p><i>Clean</i> The development has proposed an Energy Centre in Phase 1 (DEN 1) which will be designed to serve just Phase 1 of the development. It is proposed that in Phase 2, a larger Energy Centre (DEN 2) will be</p>	Noted and recommended conditions included

Stakeholder	Question/Comment	Response
	<p>constructed and the Energy Centre in Phase 1 will be decommissioned. This new Energy Centre (DEN 2) will then serve all of the developments heating and hot water loads. Block A4 is the proposed location of the Energy Centre (DEN 1).</p> <p>Issues:</p> <ul style="list-style-type: none"> <li>- The Air Quality (AQ) assessment has modelled stack heights of 3m above the roof height of block A4. There is a discrepancy between the Energy assessment and the AQ assessment; with the Energy assessment indicating that the stack heights are '2m above roof height of the tallest building.'</li> <li>- The exhaust of this stack is at a low part of the development (even at the taller 3m above roof height). It is likely that the exhaust gases will be blown into the taller buildings in the east of Block A4. This risk has not been modelled or mitigated.</li> <li>- The Energy Centre in Phase 1 needs to be confirmed and conditioned as boiler lead only (no CHP);</li> <li>- The Energy Centre in Phase 1 needs to be confirmed and conditioned that it will serve all dwelling and commercial units space heating and hot water loads in Phase One only (without greater justification and approval by the Planning Authority). And no further heating or hot water generation equipment should be allowed on the site.</li> <li>- The Energy Centre in Phase 1 needs to be confirmed and conditioned that upon the</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>construction of the larger energy centre in Phase 2 (DEN 2) that Energy Centre in Phase 1 (DEN 1) will be decommissioned and no longer used for lead energy generation. This space is then free for the developer to do with as they please;</p> <ul style="list-style-type: none"> <li>- Before commencement on site, the Council will need to approve the technical specification and pipe work route, from the Energy Centre in Phase 1 (DEN 1) to the new strategic Energy Centre in Phase 2 (DEN 2). This will have overcome any physical barriers (such as the Mosell) and this link will be fully funded by the developer (unless it serves other sites outside the St William Development); and</li> <li>- Before commencement on site, the Council will need to approve the operational practices on the development. And the Council will need to confirm that the network is designed to CIBSE best practice and be signed up to achieve at least the Heat Trust operational standards.</li> </ul> <p>Actions:</p> <ul style="list-style-type: none"> <li>- Condition that the Energy Centre (DEN 1) will be boiler lead only and serve Phase 1 heating and hot water loads. No further heating or hot water plant will be allowed on site;</li> <li>- Model the air quality impacts of the development and mitigation measures are confirmed. Specifically the low rise flue impacts on higher buildings to the East;</li> <li>- Condition that the route map and technical connection of the DEN 1 to DEN 2 is deliverable</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>and that this cost of delivering will be funded by the developer. This will be approved by the Local Planning Authority;</p> <ul style="list-style-type: none"> <li>- Condition that the Energy Centre (DEN 1) will be decommissioned as lead heating source upon construction of the Energy Centre in Phase 2. And that then all heating and hot water loads for Phase 1 of the development will be generated by DEN 2;</li> <li>- That the developer is conditioned to design and deliver its communal heating system in compliance with the CIBSE Heat Networks: Code of Practice for the UK; and</li> <li>- That the developer is conditioned to use an energy services company that are operating the network as registered participants of the Heat Trust.</li> </ul> <p><i>Green</i></p> <p>There are no renewable technologies on site. The Local Plan expects that all opportunities for renewables are taken and that the developer aims for 20% of the Developments energy load to be generated through renewables</p> <p>As this development contains no renewables it is not policy compliant (SP:04 Local Plan, London Plan 5.7).</p> <p>Action:</p> <ul style="list-style-type: none"> <li>- To review the first phase of the development and ensure that maximum opportunities for energy generation have been incorporated.</li> </ul>	

Stakeholder	Question/Comment	Response
	<p><i>Offsetting</i>  The Carbon Offset requirement is £518,400 based on £90 per tonne, for Phase One of this development and is therefore required to pay this to be policy compliant (London Plan 5.2).</p> <p>Action:</p> <ul style="list-style-type: none"> <li>- Based on the above data (and unless this changes) that the developer will pay the Council its Carbon Offsetting fund £518,400.00 for carbon reduction projects in the local area. This is in line with Policy 5.2 of the London Plan.</li> </ul> <p><b>Energy – Outline</b>  The enlarged Energy Centre (DEN2) cannot be funded through Carbon Offsetting. The Energy Centre is infrastructure; this can only be funded through Community Infrastructure Levy (CIL). This type of infrastructure is on the Council 123 list. The Carbon Offset requirement (which is £518,400 based on £90 per tonne) is still required for the Phase One of the development.</p> <p>Alongside this the enlarged Energy Centre (DEN2) is due to be constructed in Phase Two. And at this stage another assessment of carbon offsetting will be required to be undertaken at the Phase Two detailed design stage. When this comes in with a more detailed design and this offsetting will be considered and calculated then.</p>	

Stakeholder	Question/Comment	Response
	<p>Action:</p> <ul style="list-style-type: none"> <li>- To require a new energy strategy (which include analysis of lean, clean and green measures, and an overheating assessment and may include offsetting) is submitted at each future phasing of the development.</li> <li>- To require that the Phase Two of the development will include a new Energy Centre (of at least 900m<sup>2</sup>) which will serve the whole of the St William Development and neighbouring schemes.</li> </ul> <p><b>Sustainability – Phase One</b>  The submitted scheme has confirmed that all new non-domestic units will achieve a BREEAM Very Good outcome.</p> <p>There is no other assessment of sustainability for the dwellings.</p> <p>Action:</p> <ul style="list-style-type: none"> <li>- Condition that all non-domestic units will be required a post construction BREEAM Very Good certification. This should be issued 6 months post completion. See below.</li> </ul> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>You must deliver the sustainability measures as set out in Sustainability Statement (Oct 2017) by Hodkinson.</p> <p>The non-domestic units of the development shall be constructed in strict accordance of the</p> </div>	

Stakeholder	Question/Comment	Response
	<p>details so approved, and shall achieve the agreed rating of BREEAM “Very Good” and shall be maintained as such thereafter. A post construction certificate or evidence shall then be issued by an independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site for approval.</p> <p>In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the local authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p><b>Reasons:</b> In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) polices 5.1, 5.2,5.3 and 5.9 and policy SP:04 of the Local Plan.</p> <p><b>Sustainability – Outline</b> Phase 2 of the development has not yet been designed. The detailed application should submit details on how a</p>	

Stakeholder	Question/Comment	Response
	<p>high level of sustainability has been integrated into the scheme. This should cover both domestic and non-domestic units.</p> <p>Action:</p> <ul style="list-style-type: none"> <li>- Condition that all units (domestic and non-domestic) will be required to submit for approval an external auditable measure and assessment of Sustainability (such as a BREEAM). Once approved the developer will be required to submit a post construction certificate, which confirms these outcomes. See below.</li> </ul> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>You must submit for our written approval a design stage accreditation certificate confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent) a minimum of 6 months prior to commencement on site.</p> </div> <p>The development shall then be constructed in strict accordance of the details so approved, and shall achieve the agreed rating and shall be maintained as such thereafter. A post construction certificate shall then be issued by the Building Research Establishment or other independent certification body, confirming this standard has been achieved. This must be submitted to the local authority at least 6 months of completion on site.</p> <p>In the event that the development fails to</p>	

Stakeholder	Question/Comment	Response
	<p>achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the local authorities approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.</p> <p><b>Reasons:</b> In the interest of addressing climate change and to secure sustainable development in accordance with London Plan (2011) polices 5.1, 5.2,5.3 and 5.9 and policy SP:04 of the Local Plan.</p> <p><b>Over Heating – Phase One</b> The modelling for Phase 1 (only five units, and the worst case corridor) demonstrate a level of overheating against the TM59 and CIBSE criteria.</p> <p>These five residential units that are likely to present a high risk of overheating have been selected based on the below design characteristics:</p> <ul style="list-style-type: none"> <li>- Upper floor units not benefiting from external shading;</li> <li>- Single aspect rooms;</li> <li>- Units with glazing facing south, east and west that are particularly susceptible to summertime solar gains;</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- Units located in different orientations and floor levels.</li> </ul> <p>These units are not single aspect units on the development plan, and therefore benefit from cross ventilation. There is also low levels of occupancy in the units.</p> <p>Following the modelling it shows that these units will overheat in the year 2020. The applicant did not model future weather patterns that are expected in the policy.</p> <p>Action:</p> <ul style="list-style-type: none"> <li>- Further design responses to address the overheating risk should be incorporated into the scheme. Such as improved G-values in all windows, not just the higher floors.</li> </ul> <p><b>Over Heating – Outline</b></p> <p>Phase 2 of the development has not yet been designed. The detailed application should submit an overheating assessment highlighting how the design of the scheme has reduced this risk.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>- To condition that for detailed design (Aka Phase 2) a detailed overheating assessment will be submitted for approval to the Planning Authority. See Below.</li> </ul> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>The developer will submit for approval an overheating model and report. The model will</p> </div>	

Stakeholder	Question/Comment	Response
	<p>assess the overheating risk using future weather temperature projections (2050) and London weather files, and the report will demonstrate how the risks have been mitigated and removed through design solutions.</p> <p>This should be submitted to and approved in writing by the Local Planning Authority prior to any works commencing on site and any measures shall be operational prior to the first occupation of the development hereby approved.</p> <p>This report will include details of the design measures incorporated within the scheme (including details of the feasibility of using external solar shading and passive cooling and ventilation) to ensure adaptation to higher temperatures are addressed, and the units do not overheat. The report will include the following:</p> <ul style="list-style-type: none"> <li>- the standard and the impact of the solar control glazing;</li> <li>- that there is space for pipe work and that this is designed in to the building to allow the retrofitting of cooling and ventilation equipment</li> <li>- that all heating pipework is appropriately insulated</li> <li>- that passive cooling and ventilation features have been included</li> <li>- highlight the mitigation strategies to</li> </ul>	

Stakeholder	Question/Comment	Response
	<p style="text-align: center;">overcome any overheating risk</p> <p>Air Conditioning will not be supported unless exceptional justification is given.</p> <p>Once approved the development shall be constructed in accordance with the details so approved, shall be maintained as such thereafter and no change there from shall take place without the prior written consent of the Local Planning Authority.</p> <p><b>REASON:</b> London Plan Policy 5.9 and local policy SP:04 and in the interest of adapting to climate change and to secure sustainable development.</p> <p><b>Transport – Detailed</b></p> <p>There is no information on the number of electric vehicle charging points provided on the development. All new parking bays should be ready to accept electric vehicles for recharging, or the developer should set out how access to a limited number of recharging.</p> <p>Action:</p> <ul style="list-style-type: none"> <li>- To condition the delivery of all new parking spaces to be fitted with active recharging infrastructure. See below.</li> </ul> <p style="text-align: center;"><b>Condition</b></p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="680 235 1379 412">Confirmation on the details and location of the parking spaces, of which all will be equipped with Active electric Vehicle Charging Points (ECVPS) must be submitted 3 months prior to works commencing on site.</p> <p data-bbox="680 456 1379 667">Once these details are approved the Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p data-bbox="680 711 1379 813"><b>Reason:</b> To comply with London Plan Policy 6.13 and emerging Wood Green AAP Policy WG11 section 6.</p> <p data-bbox="571 894 869 927"><b>Transport – Outline</b></p> <p data-bbox="571 935 1379 1146">At this stage there is no information on the number of electric vehicle charging points provided on the development (residential and commercial uses). All new parking bays should be ready to accept electric vehicles for recharging, or the developer should set out how access to a limited number of recharging.</p> <p data-bbox="571 1190 674 1222">Action:</p> <ul data-bbox="621 1227 1272 1330" style="list-style-type: none"> <li>- To condition the delivery of all new parking spaces to be fitted with active recharging infrastructure. See below.</li> </ul> <p data-bbox="680 1373 835 1406"><b>Condition</b></p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="680 235 1379 487">Confirmation on the details and location of the parking spaces, of which all will be equipped with Active electric Vehicle Charging Points (ECVPS). This will address the residential and the commercial user needs. This must be submitted 3 months prior to works commencing on site.</p> <p data-bbox="680 527 1379 743">Once these details are approved the Council should be notified if the applicant alters any of the measures and standards set out in the submitted strategy (as referenced above). Any alterations should be presented with justification and new standards for approval by the Council.</p> <p data-bbox="680 784 1379 889"><b>Reason:</b> To comply with London Plan Policy 6.13 and emerging Wood Green AAP Policy WG11 section 6.</p> <p data-bbox="573 1040 768 1073"><b>Living Roofs</b></p> <p data-bbox="573 1078 1293 1146">Living roofs are proposed, but these are not clearly identified nor are there any details on their design.</p> <p data-bbox="573 1187 674 1219">Action:</p> <ul data-bbox="621 1224 1373 1330" style="list-style-type: none"> <li>- Condition that the applicant submits details on the location and the design of the living roofs. See below.</li> </ul> <p data-bbox="680 1370 1379 1403">That prior to commencement on site details on</p>	

Stakeholder	Question/Comment	Response
	<p>the living roof shall submitted to the local authority for approval. This will include the following:</p> <ul style="list-style-type: none"> <li>• A roof(s) plan identifying where the living roofs will be located;</li> <li>• Confirmation that the substrates depth range of between 100mm and 150mm across all the roof(s);</li> <li>• Details on the diversity of substrate depths across the roof to provide contours of substrate. This could include substrate mounds in areas with the greatest structural support to provide a variation in habitat;</li> <li>• Details on the diversity of substrate types and sizes;</li> <li>• Details on bare areas of substrate to allow for self colonisation of local windblown seeds and invertebrates;</li> <li>• Details on the range of native species of wildflowers and herbs planted to benefit native wildlife. The living roof will not rely on one species of plant life such as Sedum (which are not native);</li> <li>• Details of the location of log piles / flat stones for invertebrates;</li> </ul> <p>The living roof will not be used for amenity or sitting out space of any kind. Access will only be permitted for maintenance, repair or escape in an emergency.</p>	

Stakeholder	Question/Comment	Response
	<p>The living roof (s) shall then be carried out strictly in accordance with the details approved by the Council. And shall be maintained as such thereafter.</p> <p><b>Reason:</b> To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with regional policies 5.3, 5.9 and 5.11 of the London Plan (2011) and local policy SP:05 and SP:13.</p>	
<b>Conservation</b>	<p><b>Assessment of Significance:</b>  There are no designated above ground built heritage assets on the Site. It is not located in a conservation area and does not contain any listed structures, however, there are conservation areas and listed structures in its vicinity which contribute to the local townscape character such as Alexandra Palace (II) and Alexandra Palace Park (Registered Historic Park, II). The site is visible from various conservation areas such as Wood Green Common, New River, Alexandra Palace, Hillfield and Hornsey High Street Conservation areas. The site also appears in long distance views of the Palace from other several locations across the borough. These are identified in the Borough's locally significant views.</p>	Noted and all recommended conditions included

Stakeholder	Question/Comment	Response
	<p>It is intended that all surviving buildings on the site are demolished. The former Clarendon Gas Works, Olympia Trading Estate and industrial units along Western Road, has been cleared of all gas work features, including the two large gas holders, although commercial buildings remain on Coburg and Western Roads. To the north of the site, the Chocolate Factory is also a development site. It includes a locally listed five-storey Art Deco-styled curved industrial building; an ivy-clad two-storey building, designed by Terry Farrell Partnership in 1979, and other brick buildings.</p> <p>Within the site, 63 – 77 Coburg Road, is a group of purpose-designed, two-storey light industrial, brick buildings, with curved details and considered fenestration. The railway embankment runs along the entire western edge of the site and provides a continuous albeit inactive edge.</p> <p>In townscape terms, the site sits within an area dominated by the railway and industrial uses. The building typology is that of large to medium scale low rise industrial buildings, offering very little permeability and no street frontage. The site is adjacent to the established early Victorian residential areas of Wood Green and Hornsey with retail cores along their respective High Roads. The immediate surrounding urban form is also strongly dominated by Alexandra Palace and the topography around it, with most streets rising away from the site, and towards the ridge of the Palace, allowing views of the site along from neighbouring streets such as Hillfield Avenue.</p>	

Stakeholder	Question/Comment	Response
	<p>Overall, the site has an ‘abandoned’ industrial character with several industrial buildings still in use. The 44-metre-tall gasometers that used to exist on the site dominated the skyline of the surrounding area and were a reminder of the site’s history. Although these have been disused, the fragmented remnants of its previous use along with the remaining current and disused industrial buildings gives a story of the area’s past and of Wood Green’s history and development.</p> <p><b>Development proposal:</b>  The Wood Green Area Action Plan identifies this site as a key regeneration site. This aspiration follows from the earlier Haringey Heartlands Development framework that also identified the site for re-development. The area is also identified as a key opportunity site in the Mayor’s London Plan. In addition, it is also an area that has been identified as a potential site for tall buildings. As such the area is likely to undergo a vast change in both intensity and variety of land uses, as well as the scale and height of buildings with clusters of tall and taller buildings. This would create a new character within the area, that of a ‘town centre’ and ‘civic hub’ typology with key ‘marker’ buildings located close to transport nodes.</p> <p>Given this context, the proposed development is considered to be in keeping with the envisaged AAP framework. However, the tall and taller elements of the development would have an impact upon the views of Alexandra Palace from various locations within the borough. Views from the Palace and other adjacent</p>	

Stakeholder	Question/Comment	Response
	<p>conservation areas would also be affected. These views have been discussed in detail in the applicant's Townscape and Visual Impact Assessment (TVIA).</p> <p>Part of the significance of the Alexandra Palace is derived from its 'hill top' location. The development will partly block some long-distance views of the Palace, for example from Freedom Road, adjacent to Broadwater Farm Community Centre and from Watermead Way Railway Bridge. The development would also be visible from the Palace and the Park when looking towards Wood Green.</p> <p>Additionally, the blocks will dominate views most significantly from Wood Green Common Conservation Area. The blocks would also be prominently visible from the top of Hillfield Avenue and the New River Conservation Areas. These areas are primarily domestic and residential, characterised by two to three storey Victorian or later terraces with some new development up to 7 storeys along the New River. As such the proposed development, by virtue of its scale, would be at odds with the adjacent area and is considered to cause some harm to these heritage assets, qualified as less than substantial under the NPPF.</p> <p><b>Assessment of harm against mitigation and benefits</b>  Having regard to the envisaged vision of the Wood Green AAP, the scale and intensity of the envisaged AAP is such that any development at these locations would have an impact on the views as described above. It is therefore important to ensure that the urban form</p>	

Stakeholder	Question/Comment	Response
	<p>and architectural language of the blocks is of very high quality, one that would mitigate the adverse impact of these views, resulting in heritage and townscape benefits that would outweigh the less than substantial harm.</p> <p>In most cases, the views are considered to be positive, one that signifies the changing townscape and 'role' of Wood Green in the 21st Century. The Master plan framework envisages more permeability of the site connecting the area with the wider social infrastructure through key pedestrian and vehicle routes. Buildings are designed to create and address new public routes, open squares and streets that are considered to be hugely positive to the urban form and functionality of the area. As such, it is considered that the overall impact of the proposal would be positive, that would outweigh the less than substantial harm caused due to their scale.</p> <p>Additionally, the Design Code as part of the outline submission, gives detailed parameters on positioning, openings to allow more permeability, height, scale, massing and materiality of the blocks along with movement patterns. This would be key to ensure that the development remains of high quality and delivers on the townscape benefits that would be essential to outweigh the less than substantial harm. It should therefore be incumbent upon the applicant and the Council to enter into a legal agreement that enshrines the parameters of the Design Code for the life of the development, whilst allowing flexibility for market changes.</p> <p>To further mitigate the adverse impact on the industrial</p>	

Stakeholder	Question/Comment	Response
	<p>heritage of the site, the applicant has submitted a Cultural Strategy that highlights possible ways of documenting and interpreting the cultural and industrial history of the area. Once implemented, the proposals contained within this strategy would further help in the understanding and appreciation of the area, outweighing the harm caused. Again, this document should be agreed legally with the applicant to ensure that the development implements the proposals successfully.</p> <p><b>Conclusion</b> Overall, from a conservation point of view, it is considered that the proposal by virtue of its scale would cause some harm to the significance of Alexandra Palace (II), Alexandra Palace Park (Historic Park and Conservation Area), Wood Green Common, Hillfield Avenue and New River Conservation Areas. However, the proposed built form, urban typology, and circulation pattern along with the layout of the blocks is likely to result in positive townscape benefits that would outweigh the less than substantial harm caused. In addition, the proposals contained in the Cultural Strategy would also help to mitigate the harm caused. It is important however, that both the parameters contained within the Design Code and proposals within the Cultural Strategy are agreed legally so that the positive benefits of the scheme are realised for the life of the development.</p>	
<p><b>Trees and Nature Conservation</b></p>	<p>In summary, I am happy to support this scheme, but require additional information, which can be provided as part of planning conditions.</p>	<p>Noted and recommended conditions included</p>

Stakeholder	Question/Comment	Response
	<p>The trees specified for removal to facilitate this scheme are of low quality and value and should not be an impediment to development. The trees of moderate value (T16 and T28-T37) are to be retained. A Tree Protection Plan (TPP) and Arboricultural Method Statement (AMS) must be provided to specify what measure are to be implemented to ensure T16 and T28-T37 are adequately protected. The AMS must also detail any works that may impact on the Root Protection Areas (RPA) of these trees and what mitigation measures will be put in place.</p> <p>A large number of new trees are proposed to be planted and these will help to mitigate the loss of existing trees, specified for removal. The specification for '<i>Street Trees</i>' in the design guide is to industry best practice. However, I do have some concerns regarding the choice of species. It is stated that streets and communal courtyards should use <i>Alnus glutinosa</i> (Lacinata) species. For all large planting schemes consideration must be given to planting a diverse tree population to enhance ecological resilience to pests and diseases and the effects of climate change. More native species should be considered to increase local biodiversity. The design guide did not specify the nursery size of trees at the time of planting, this may be in another document.</p> <p>For this scheme, I think there must be also be a range of different sized trees planted ranging from extra heavy standards (14-16cm/16-18cm/18-20cm stem girth) to semi-mature specimens (20-25cm/25-30cm stem girth), appropriate to their location. There must also be a five-</p>	

Stakeholder	Question/Comment	Response
	year aftercare plan for all newly planted trees to ensure they become independent in the landscape.	
<b>EXTERNAL</b>		
<b>Designing Out Crime</b>	<p>Designing Out Crime Officer (DOCO) has met the project architects. In summary, due to the extent of information provided for the 'outline' element of the application, the DOCO has identified concerns that need to be addressed on a phase by phase basis. These relate to community/amenity space, perimeter treatments, postal strategy, bicycle stores, physical security, external lighting, access control, refuse stores, compartmentalisation, CCTV (public realm) and commercial premises security.</p> <p>The DOCO has requested that a planning condition requiring (1) details to be submitted to and approved in writing by the LPA to demonstrate that each building will achieve full Secured by Design Accreditation; (2) Secured by Design accreditation must be obtained for each building before it is occupied; and (3) the applicant must seek the advice of the DOCO for each building or phase.</p>	Noted and recommended conditions included
<b>Environment Agency</b>	<p>There is a great opportunity at the site to de-culvert the Moselle Brook and restore the designated 'main river' to a more natural state as required by the Thames River Basin Management Plan (RBMP) under the Water Framework Directive) and in line with LB Haringey's adopted Local Plan Policy DM28. Naturalising rivers provides flood risk, water quality, biodiversity and recreational benefits for the area. It is disappointing that</p>	Noted and recommended conditions included

Stakeholder	Question/Comment	Response
	<p>de-culverting options have not been deemed feasible at this time and that the Moselle Brook cannot be integrated as a principal feature of this development.</p> <p>However, the EA is able to accept and support the principle of a legal agreement being attached to any planning permission granted that will ensure ongoing monitoring of water quality of the Moselle Brook and a commitment to de-culverting in the future when water quality is satisfactory. The EA would be happy to advise on such an agreement and support any quality checks or trigger points that may be necessary.</p> <p>In any event, the following conditions are requested:</p> <ul style="list-style-type: none"> <li>• Approval of a remediation strategy for each phase of development;</li> <li>• Measures to deal with unexpected contamination;</li> <li>• Approval of a verification report for each phase before that phase is brought in to use;</li> <li>• Approval of scheme for managing any boreholes installed;</li> <li>• Piling and foundation designs using penetrative methods to be approved by LPA;</li> <li>• No piling to commence until a groundwater monitoring and maintenance plan has been approved;</li> <li>• Infiltration systems shall only be used where it can be demonstrated that they will not pose a risk to groundwater quality.</li> </ul>	

Stakeholder	Question/Comment	Response
<b>Greater London Authority</b>	See Appendix	Noted and recommended conditions included
<b>Greater London Archaeological Advisory Service</b>	No comments received.	Watching brief compliance condition recommended
<b>London Fire Brigade</b>	No comments received.	
<b>Natural England</b>	No comments received.	
<b>Thames Water</b>	<p><u>Waste Comments</u></p> <p>Surface Water Drainage - With regard to surface water drainage, it is the responsibility of a developer to make proper provision for drainage to ground, watercourses or a suitable sewer. In respect of surface water, it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off-site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</p> <p>There are public sewers crossing or close to your development. In order to protect public sewers and to</p>	Noted and recommended conditions included

Stakeholder	Question/Comment	Response
	<p>ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted for extensions to existing buildings. The applicant is advised to visit <a href="http://thameswater.co.uk/buildover">thameswater.co.uk/buildover</a></p> <p>No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p> <p>A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming</p>	

Stakeholder	Question/Comment	Response
	<p>pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent.</p> <p>Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed.</p> <p>“Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed”. Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames</p>	

Stakeholder	Question/Comment	Response
	<p>Water Development Control Department prior to the Planning Application approval.</p> <p>'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:</p> <p>“A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing <a href="mailto:wwriskmanagement@thameswater.co.uk">wwriskmanagement@thameswater.co.uk</a>. Application forms should be completed on line via <a href="http://www.thameswater.co.uk/wastewaterquality">www.thameswater.co.uk/wastewaterquality</a>.”</p> <p><u>Water Comments</u></p>	

Stakeholder	Question/Comment	Response
	<p>The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed:</p> <p>Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.</p> <p>Thames Water recommend the following informative be attached to any planning permission: There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.</p> <p>Thames Water recommend the following informative be attached to any planning permission:</p> <p>There are large water mains crossing the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access</p>	

Stakeholder	Question/Comment	Response
	<p>for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.</p> <p>No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p>	
<p><b>TfL</b></p>	<p>The following comments represent the views of Transport for London officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.</p> <p><b>Site description</b> The site is bounded by Coburg Road to the north, Hornsey Park Road to the east, and rail lines to the west.</p>	<p>Noted and recommended conditions and section 106 clauses included</p>

Stakeholder	Question/Comment	Response
	<p>The nearest section of the Transport for London Road Network (TLRN) is the A406 North Circular Road which is approximately 2.8km to the north of the site. The nearest section of the Strategic Road Network (SRN) is the A105 High Road Wood Green which is approximately 1km to the north-east.</p> <p>The nearest London Underground (LU) Stations from the site are Wood Green and Turnpike Lane which are both approximately 1km from the site and both served by the Piccadilly Line. The nearest rail stations from the site are Alexandra Palace and Hornsey which are both approximately 900m from the site.</p> <p>The nearest bus stops are the pair of Wightman Road bus stops that are located approximately 500m to the south of the site. These are served by bus routes 41, 144, N41 and N91.</p> <p>Due to the aforementioned public transport connections, the Public Transport Accessibility Level (PTAL) of the site is rated between 2 and 4 (on a scale of 1 to 6 where 6 is excellent and 1 is very poor).</p> <p><b>Planning overview</b></p> <p>Haringey Council have defined this site as falling within the boundary of the Wood Green Action Area Plan. One of the key spatial objectives of the plan is the creation of more than 7,000 homes over the longer term, linked to the potential for a Crossrail 2 station. Wood Green is also a metropolitan centre in the London Plan and an</p>	

Stakeholder	Question/Comment	Response
	<p>Intensification Area.</p> <p><b>Proposal</b></p> <p>Hybrid planning permission (part Outline, part Detailed) for the demolition of Olympia Trading Estate and Western Road buildings and structures, and a phased, residential led mixed use development. The development schedule that is provided in the TA is for:</p> <ul style="list-style-type: none"> <li>- C3 residential: 1,699 units</li> <li>- A1 - A5 Retail / Financial &amp; Professional Services / Café / Restaurant / Drink Establishment: 3,950 sqm*</li> <li>- B1 Office: 7,500 sqm</li> <li>- D1 Nursery: 417 sqm</li> <li>- D2 Leisure**: 2,500 sqm</li> <li>- Resident car parking***: 452 Total Car Parking Spaces of which 170 are disabled spaces</li> <li>- Cycle parking provision: 3,065 spaces</li> </ul> <p>*Up to 1,500sqm maximum of A1 Food Retail floorspace;  **Includes a flexible community space, gym and ancillary facilities;  ***Includes 405 spaces at basement level and 20 at ground floor level</p> <p><b>Trip generation</b></p> <p>The full site multi modal trip generation forecasts are provided. We are satisfied that the trip generation methodology is in accordance with TfL TA Best Practice Guidance. The full site multi modal trip generation</p>	

Stakeholder	Question/Comment	Response
	<p>forecasts for the March 2012 Consented scheme are also provided. The Consented scheme forecasts are then subtracted from the forecasts for the current proposal to get the net trip generation figures. We are satisfied with this approach.</p> <p><b>Buses</b></p> <p>There is a gap in the bus network at the development site location i.e. homes are over 400 meters from the nearest bus stop. The principle of this requiring mitigation was established under the Clarendon Square (HGY/2009/0503) planning application (consented in March 2012) under which £660,000 was secured through the S106 agreement to fund bus route extension(s) and/or increased bus service frequency to serve the development, along with highway improvements to facilitate bus access to the area. The current development is of an even greater scale and therefore brings with it a greater need to mitigate the location of the development as a bus network hole.</p> <p>For the current development proposal to be acceptable to TfL, the bus network gap at the location must be mitigated by the extension of an existing bus route to start / finish within the area. This will require the following from the applicant:</p> <ul style="list-style-type: none"> <li>- the sum of £1,250,000 (£250,000 per annum for 5 years) to be secured through the S106 Agreement to operate the extended route;</li> <li>- <input type="checkbox"/> The provision of a turning point either within the site, or at a reasonable nearby alternative location;</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>- The provision of a minimum of 4 bus stops within the site;</li> <li>- The provision of a bus stand within the site;</li> <li>- The provision of toilet facilities for the bus driver in close proximity to the bus stand within the site.</li> </ul> <p>We request that additional bus assessments are carried out under the following two scenarios:</p> <ul style="list-style-type: none"> <li>- Scenario one: bus route 230 being extended into the site;</li> <li>- Scenario two: bus route 67 being extended into the site.</li> </ul> <p>This purpose of this analysis is to help bring about an informed decision regarding which bus to extend into the site.</p> <p><b>Car parking</b></p> <p>A total of 425 parking spaces are to be provided for the residential element of the development, including 170 disabled spaces. This equates to residential parking provision of 0.25 spaces per unit. The disabled parking provision satisfies the London Plan / London Plan Housing SPG requirement for each wheelchair accessible unit to have an accessible parking space (assuming that 10% of units are wheelchair accessible).</p> <p>The residential car parking will be split as follows across four car parks:</p> <ul style="list-style-type: none"> <li>- Block A1 – A4 Basement: 51 spaces including 34</li> </ul>	

Stakeholder	Question/Comment	Response
	<p>disabled spaces</p> <ul style="list-style-type: none"> <li>- Block B1 – B4 Basement: 72 spaces including 28 disabled spaces</li> <li>- Block C1: 20 spaces including 4 disabled spaces</li> <li>- Northern Quarter Basement: 282 spaces including 104 disabled spaces</li> </ul> <p>There is no mention of electric vehicle charging in the TA. London Plan electric vehicle charging standards for residential parking – 20% active and 20% passive provision – must be met.</p> <p>The following new on-street parking will be installed on Mary Neuner Road to accommodate visitors: three short stay Pay &amp; Display spaces; three disabled parking bays; three car club bays.</p> <p>The non-residential land uses will be car free. For general parking this is aligned to the London Plan and we consider it appropriate given the public transport accessibility of the site. However, the parking needs of disabled employees and visitors are not provided for in this proposal which represents a shortcoming against the London Plan standards. request that the non-residential parking proposal is revised to provide for the needs of disabled staff motorists.</p> <p><b>Walking</b></p> <p>A PERS Audit (October 2017) has been provided as an</p>	

Stakeholder	Question/Comment	Response
	<p>Appendix to the TA. In line with the Mayor’s Healthy Streets approach, the Council should draw upon the PERS assessment to prioritise investment in the pedestrian environment and request S106 contributions for their funding.</p> <p>The TA does not consider pedestrian wayfinding. We recommend that the Council and the Applicant consider our TfL pre-application advice comments regarding Legible London wayfinding.</p> <p><b>Cycling</b></p> <p><u>Analysis of cycling conditions</u></p> <p>The Applicant has provided an identification of existing cycling infrastructure in the local area (TA – pp12). The applicant has also undertaken a Cycling level of Service (CLoS) of key links connecting the site to the local area and an assessment of three key junctions surrounding the site. We welcome the analysis that has been produced and importantly, we welcome the identification of potential solutions to the identified issues. According to the assessment provided, the recurring elements which most links scored poorly seem to be the lack of wayfinding signs and the separation of cyclists with motorists. The applicant recommends that TfL and LBH consider these suggestions as part of their on-going reviews of the local highway network. We recommend that the Council consider the cycle solutions that have been identified by the Applicant and consider requesting funding for local cycle improvements through the S106.</p>	

Stakeholder	Question/Comment	Response
	<p>Please note that TfL and the Borough have been working on the delivery of a Quietway Route in close vicinity of the Site (Coburg Road and Western Road) – see Figure 1. This route would be convenient for residents and visitors of the site.</p> <p><u>Access through the site</u></p> <p>The applicant should clearly demonstrate the impact that their proposals will have on cycling, both from the perspective of people travelling to and from the site and those moving through the area. Therefore, the applicant should illustrate how the proposal supports the local network (by highlighting existing and proposed routes in the local area and how they connect to proposed routes within the site). The London Plan recommends that new developments contribute to the development of the local network.</p> <p>Additionally, the applicant should identify all access points for cycling to the site and clarify which routes are available for those moving through and to/ from the site, including shared pedestrian/ cyclist’s routes. This information will help to understand the potential of the proposal to support accessibility and permeability for cycling to the site. As suggested at the pre-application stage, the applicant could present all this information on plan.</p> <p><u>Design of the Mary Neuner Road</u></p> <p>The proposal for Mary Neuner Road is that cycles share</p>	

Stakeholder	Question/Comment	Response
	<p>the carriageway with motor vehicles. We welcome the narrowed carriageway design from 7.3m to 6.5m. This will discourage overtaking of cyclists by motor vehicles.</p> <p><u>Cycle parking quantum</u></p> <p>The proposal includes the provision of a total of 3065 cycle parking spaces, 2863 long-stay and 202 short-stay cycle parking spaces.</p> <p>Due to lack of information on table 3.1: Development Schedule (TA – p22), it was not possible however to assess on whether this proposal meets the London Plan requirements for cycle parking spaces for use class C3, D1 and D2.</p> <p>A summary of the proposed cycle parking against London Plan standards are provided.</p> <p><u>Location and access to cycle parking</u></p> <p>The applicant states that within the Northern Quarter, cycle parking will be provided at the basement level, within dedicated cycle stores (TA – pp36). However, no plan has been provided. We request that the applicant provides a basement plan highlighting the location of long and short-stay cycle parking and demonstrates how users can access the various cycle stores through the Northern Quarter.</p> <p>In the Southern Quarter, cycle parking is provided at the ground floor level both internally and externally. The plan provided does not include however a great level of detail.</p>	

Stakeholder	Question/Comment	Response
	<p>The applicant should provide a plan that demonstrates how those on cycles can access the various cycle storage facilities in the Southern Quarter.</p> <p><u>Type of cycle parking stands</u></p> <p>No detail was found on proposed type of cycle parking facilities. We remind that LCDS states that 5% of stands ought to be able to accommodate larger cycles, including adapted cycles used by people with mobility impairments. The easiest way to meet accessibility requirements on types of cycle parking, as well as serve different user needs generally, is to provide a mix of types of cycle stands. Two-tier racks are generally not suitable for parking 'non-standard' cycles. Where these represent the main form of provision, some conventional tubular stands (e.g. Sheffield stands) should also be provided – at least 5% of the total number and spaced appropriately. Where two-tier racks are provided, they should have a mechanically or pneumatically assisted system for accessing the upper level, as many people find using these spaces difficult. The product must also allow for double-locking. Minimum aisle widths, as set out in LCDS and recommended by manufacturers, must be met in order for these stands to be usable.</p> <p><b>Crossrail 2</b></p> <p>Wood Green has been identified as a possible location for a new Crossrail 2 station, with an alternative option being for Crossrail 2 stations at both Alexandra Palace and Turnpike Lane stations. TfL has submitted an</p>	

Stakeholder	Question/Comment	Response
	<p>Outline Business Case for Crossrail 2 to the Government and is awaiting a decision. Once a decision and announcement have been made, a public consultation will be undertaken on the preferred option, this is likely to be in 2018. With either option, Crossrail 2 would improve the sustainable travel choices available from the site and would help further support high density development in the area.</p> <p>The planning application has not demonstrated how it has taken account of Policy SA1 in the Haringey Site Allocation DPD which states that sites within 1,000 metres of a Crossrail 2 station will be scrutinised in terms of design, provision of routes to the station and consideration of density to include future PTAL increase.</p> <p>We estimate that PTAL would increase in this location as a result of Crossrail 2 and therefore density of development especially in later phases should be optimised.</p> <p>In the event that planning permission is granted, conditions and an informative should be imposed requiring the following:</p> <p><u>Crossrail 2 Standard Conditions</u></p> <p>None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling and any other temporary or permanent installations and for ground investigations, have been submitted to and approved in</p>	

Stakeholder	Question/Comment	Response
	<p>writing by the Local Planning Authority which:-</p> <ul style="list-style-type: none"> <li>(i) Accommodate the proposed location of the Crossrail 2 structures including temporary works,</li> <li>(ii) Accommodate ground movement arising from the construction thereof,</li> <li>(iii) Mitigate the effects of noise and vibration arising from the operation of Crossrail 2 within its tunnels and other structures.</li> </ul> <p>The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required by paragraphs 1(i), 1 (ii) and 1 (iii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied. No alteration to these aspects of the development shall take place without the approval of the Local Planning Authority in consultation with Crossrail 2.</p> <p><u>Informative:</u>  Applicants should refer to the Crossrail 2 Information for Developers available at <a href="http://crossrail2.co.uk">crossrail2.co.uk</a>. Crossrail 2 will provide guidance in relation to the proposed location of the Crossrail 2 structures and tunnels, ground movement arising from the construction of the tunnels and noise and vibration arising from the use of the tunnels. Applicants are encouraged to contact the Crossrail 2 Safeguarding Engineer in the course of preparing detailed design and method statements.</p> <p><b>Freight</b></p>	

Stakeholder	Question/Comment	Response
	<p><u>Construction</u></p> <ul style="list-style-type: none"> <li>- The Draft Construction Traffic Management Plan shows average weekly and daily trips by construction phase. These are fairly high average values, reaching averages of 100-200 vehicles a day for extended periods. The delivery programme should show peak movements by construction phase as well as averages so that we can consider the impact on the road network.</li> <li>- The Draft Construction Traffic Management Plan lists working hours but does not show consideration of any measures to retime loads or measures to mitigate congestion.</li> <li>- We request that a Detailed Construction Logistics Plan is secured by pre-commencement condition.</li> </ul> <p><u>Deliveries</u></p> <p>We recommend that the Council ensures that the commitments in the draft DSP are included in the full DSP. We recommend that the Council ask that the full DSP shows how delivery vehicles are restricted during peak periods.</p> <p>A full Delivery and Servicing Plan should be secured by condition.</p> <p>I trust that the above provides you with a better understanding of TfL's current position on the document. Please do not hesitate to contact me if you have any</p>	

Stakeholder	Question/Comment	Response
	<p>questions or need clarification on any of the points raised.</p>	
<p><b>UK Power Networks</b></p>	<p>We note that the applicant has contacted UK Power Networks in relation to relocating the substation and would just highlight the importance of this being actioned as part of this development. We are not opposed to the Application at present but this is based on a mutually agreeable relocation being confirmed.</p>	<p>Noted and recommended conditions included</p>
<p><b>Environment Agency</b></p>	<p>Thank you for consulting us on this application and apologies for the late response which was due to the sensitive nature of the site and matters of daylighting the Moselle Brook main river than runs in culvert through the site.</p> <p>We have had pre-application discussions with the applicant and their agents to help them try to achieve their vision for this development; while also maximising environmental opportunities. We believe there is a great opportunity at the site to de-culvert the Moselle Brook and restore the designated 'main river' to a more natural state as required by the Thames River Basin Management Plan (RBMP) under the Water Framework Directive (WFD) and in line with your adopted local plan policy DM28. Naturalising rivers provides flood risk, water quality, biodiversity and recreational benefits for the area. It is disappointing that de-culverting options have not been deemed feasible at this time and that the Moselle Brook cannot be integrated as a principal feature of this development. However, following our recent discussions on this matter we are able to accept and</p>	<p>Noted and recommended conditions included</p>

Stakeholder	Question/Comment	Response
	<p>support the principle of a legal agreement being attached to any planning permission granted that will ensure ongoing monitoring of water quality of the Moselle Brook and a commitment to de-culverting in the future when water quality is satisfactory. We would be happy to advise on this agreement and support with any quality checks or trigger points that may be necessary.</p> <p>We consider planning permission could be granted subject to the following conditions being imposed.</p> <p>Conditions relate to the following:</p> <ul style="list-style-type: none"> <li>• Risks associated with contamination of the site</li> </ul> <p>Note: The developer is part way through the process of developing a detailed Remediation Strategy, as required by this planning condition. The condition adopts a holistic approach, as recommended in CLR 11, so cannot be part discharged. If, during development, contamination not previously identified is found to be present at the site then no further development of that phase (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <ul style="list-style-type: none"> <li>• Verification report demonstrating the completion of works set out in the approved remediation strategy</li> </ul>	

Stakeholder	Question/Comment	Response
	<ul style="list-style-type: none"> <li>• A scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes</li> </ul> <p>The submitted planning application indicates that boreholes have been and will need to be installed at the development site to investigate land and groundwater quality and potentially for geotechnical investigations. If these boreholes are not decommissioned correctly, they can provide preferential pathways for contaminant movement, which poses a risk to groundwater quality. Groundwater is particularly sensitive in this location because the proposed development site is within Source Protection Zone 1 relating to the deep chalk aquifer.</p> <ul style="list-style-type: none"> <li>• Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority</li> <li>• Piling for the development hereby permitted may not commence until a groundwater monitoring and maintenance plan in respect of potential contamination mobilised by piling activities including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority.</li> </ul> <p>Informative</p>	

Stakeholder	Question/Comment	Response
	<p>The soil/land of the proposed rain garden along the route of the Moselle Brook must be free from contamination so that none is leached into the brook or shallow groundwater. This was mentioned in pre-application discussions (our ref: NE/2017/126644/02) and repeated below:</p> <p>"...keeping the Moselle in culvert and creating a rain garden above the culvert along the course of the brook. If this option is carried forward then the culvert will need to be sealed from contamination in the made ground, the seal will need to be maintained for the life of the development and the rain garden must not cause contaminants to be leached out of the made ground".</p> <p>Additional Information Groundwater and Contaminated Land The previous use of the proposed development presents a risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are sensitive in this location because the proposed development site:</p> <ul style="list-style-type: none"> <li>• is within Source Protection Zone 1, relating to the deep chalk aquifer.</li> <li>• and a watercourse is located within the site.</li> </ul> <p>The EIA submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is</p>	

Stakeholder	Question/Comment	Response
	<p>undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority.</p> <p>In light of the above, the proposed development will only be acceptable if the conditions listed above are imposed on any planning permission. Without these conditions we would object to the proposal in line with paragraph 109 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.</p> <p>The Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies. We recommend that developers should:</p> <ol style="list-style-type: none"> <li>1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.</li> <li>2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.</li> <li>3. Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed.</li> </ol>	

Stakeholder	Question/Comment	Response
	<p>4. Refer to the contaminated land pages on GOV.UK for more information.</p> <p>The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste.</p> <p>Flood Risk</p> <p>We have no concerns with this development regarding flood risk. The site is in Flood Zone 1 and development is outside of the 8m buffer. The Moselle Brook has plenty of capacity for the flows through this site, so we don't expect any increased risk of flooding whenever the day comes to open up the river through the site.</p>	
<p><b>Secured by Design Officer Comments (Metropolitan Police)</b></p>	<p>Thank you for allowing us to comment on the above planning proposal.</p> <p>With reference to the above application I have now had an opportunity to examine the details submitted on the local authority website under ref number HGY/2017/3117 and would like to offer the following comments, observations and recommendations.</p> <p>These are based on available information, including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.</p> <p>1.0 It is my professional opinion that crime prevention and community safety are material considerations for any developer, because of the proposed use, design, layout and location of the development proposed.</p>	<p>Noted and recommended conditions included</p>

Stakeholder	Question/Comment	Response
	<p>2.0 I can confirm that at this point in time I have met with the project architects and had initial discussions in regard to their intentions around security or Secured by Design (SbD), however I believe that further consultation is required as and when the development progresses through each phase.</p> <p>2.1 I have reviewed the planning application and due to the areas of concern we believe presently exist with the proposed development (As detailed in Appendix</p> <p>3.2 I have asked for a condition to be applied to this development. As such the police would ask that a condition is added by the local authority, as laid out in section 3.2. The inclusion of any such condition would assist to reassure police concerns.</p> <p>Community Safety – Secured by Design Conditions:</p> <p>3.0 Crime prevention and community safety are material considerations of the borough and If the L.B. Haringey are to consider granting consent, I would ask that the conditions detailed below (3.2) be attached.</p> <p>This is to mitigate the impact of the proposed development on local residents and deliver a safer school environment in line with the safe guarding of children policy.</p> <p>This is in line with the boroughs Local Development Framework policies CP3 and DC 7. I would also like to draw your attention to Section 17 CDA 1988 and the NPPF, (See appendix 1) in also supporting my recommendations.</p>	

Stakeholder	Question/Comment	Response
	<p>3.2 (1) I request that prior to carrying out above grade works of each building, residential or commercial, or part of any new building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such parts of a building will achieve full Secured by Design' Accreditation.</p> <p>The development shall only be carried out in accordance with the above approved details.</p> <p>(2) Prior to the first occupation of each building or part of a building or use, a 'Secured by Design' accreditation must be obtained for such building or part of such building or use and thereafter all features are to be permanently retained.</p> <p>(3) The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) for each building or phase of the development and accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of each building or phase of said development.</p>	
<b>LOCAL REPRESENTATIONS</b>		
<b>Alexandra Park and Palace Charitable Trust</b>	<p>1.0. Introduction</p> <p>1.1. Set in 196 acres of parkland, Alexandra Palace is an iconic North London destination of important historical significance. Opened in 1873, it provides a significant recreational resource for the public, particularly benefitting the local population of Haringey (London</p>	All comments noted

Stakeholder	Question/Comment	Response
	<p>Borough of Haringey). Our thriving events programme sees over 700,000 people visit the Palace each year to enjoy a varied programme of live sport, exhibitions and music gigs. The total number of visitors to the site (including the Park) is c3.2m visitors per year.</p> <p>1.2. On events days, there can be anything between 10,000 and 50,000 people coming to the Park and Palace, many of whom arrive via public transport. The Park particularly is at capacity in some areas, placing heavy pressure on the flora and fauna, the recreational facility and the Trust in terms of managing the impact of visitors, litter and security - all of which are compounded by historical poor drainage and outdated infrastructure. There are areas of the Park that have not been designed for prolonged periods of everyday use or large volumes of visitors. The on-site security team keep a daily record of Incidents of Interest and it is estimated that the split between issues relating to the Park and to the Palace is c60/40, rising to 70/30 over the summer months as the team deal with a variety of anti-social behaviour activities from rough sleeping to fly-tipping and graffiti.</p> <p>2.0. Haringey Heartlands/ Clarendon Road</p> <p>2.1. In accordance with local policy, the development site falls under two site allocations (SSA22 and SSA24). It is also identified in the emerging Wood Green AAP. In March 2017, the Trust made specific reference to the site allocation within the draft AAP as part of the most recent consultation process:  “The redevelopment of the Clarendon Road site is of</p>	

Stakeholder	Question/Comment	Response
	<p>particular interest to APPCT, and we would be keen to be engaged in discussions during the planning stages. We are particularly interested in the opportunity for CIL payments to be utilised for Park improvements and the provision of new/ improved leisure and recreational facilities. As highlighted in the earlier section on access to open space, the Alexandra Park plays the role of a strategic open space and will be used by new residents of both this site and the wider Heartlands sub-area (this is particularly important given that the net anticipated residential units for this sub-area is 3,512, the largest proportion of the total 7,701 (6.10 Outputs)).</p> <p>The potential for a landmark building on this site would need to be sensitive to the setting of the Palace, the Conservation Area within which the Park sits, along with the protected and local viewing corridors.”</p> <p>3.0. Impact of increased population</p> <p>3.1. This development proposes 163,300m<sup>2</sup> of residential floorspace which could indicatively deliver 1,697 new homes. If each new home was to house two people there would be over 3,300 people living on the site. However, the designs of the houses with play areas suggests that the developers are expecting families too, so the occupation levels could be higher. The design incorporates green spaces/pocket parks and play areas that should alleviate some pressure on Alexandra Park from general play/ recreational use, however the application documents specifically make reference to Alexandra Park supporting the provision of green space</p>	

Stakeholder	Question/Comment	Response
	<p>for the development:</p> <p>“The quantum of play space for 0-5 years olds, 6-11 years old and 12+ will be defined at reserved matter stage. The Illustrative Masterplan for the outline component illustrates a requirement of 1,800m<sup>2</sup> of play space, and 1,930m<sup>2</sup> is proposed. It is expected that the 0-11-year-old play space will be secured on site, supported by existing play and sports facilities in the locality at Wood Green Common and Alexandra Park. 12+ play provision will be delivered off site if necessary”</p> <p>“Approximately half of Alexandra Park falls within 800m of the Site; this is the largest open space in proximity to the Site, offering 80 hectares of parkland.”</p> <p>“Within the terms of the GLA guidance, the Community Park is a Local Park which should be available within 400m of dwellings. This accessibility target is met for all dwellings on site. With Alexandra Park fulfilling the role of Metropolitan Park (within 1.2km of dwellings), the site will be well served for parks generally.”</p> <p>3.2. Haringey’s network of open spaces is integral to the Borough’s environmental well-being. APPCT is keen to ensure the strategic open space of Alexandra Park can be a sustainable, welcoming and well maintained recreational asset for the Borough’s residents without impairing our ability to welcome the public from further afield.</p> <p>3.3. As well as residents, there is likely to be an increase</p>	

Stakeholder	Question/Comment	Response
	<p>in usage of the Park from dog walkers. Dog walkers are likely to use the Park all-year round in all weathers. Studies from across the UK repeatedly show that the three most important amenities dog owners seek are off-lead access, in spaces that are close to home and away from traffic, which potentially makes Alexandra Park the default green space for the development, for dog walking. It is estimated that 27% of homeowners also own a dog, although this figure is likely lower in apartment housing. Even at half this rate, this could equate to over 200 additional dogs being walked in the Park on a daily basis, accessing the Park via a route that has not been designed as a major access point.</p> <p>3.4. This will result in increased wear and tear, increased pressure on already over-used bins, increased pressure on the wildlife and biodiversity and longer term creates user pressures for the Trust in the delivery of its primary purposes as can be seen already when the Park is partly closed for events.</p> <p>3.5. It is also likely to increase the level of dog walking on the sports field, which is already an issue of tension/concern to the leaseholders. This could result in additional management measures being required to protect the playing surfaces and manage the user conflicts.</p> <p>3.6. Consequently, APPCT would like to understand what opportunities there would be for contributions towards upgrading, maintaining and improving the local area's existing open spaces, including Alexandra Park.</p>	

Stakeholder	Question/Comment	Response
	<p data-bbox="573 269 873 298">4.0. Penstock Tunnel</p> <p data-bbox="573 342 1377 1032">4.1. The Trust welcomes the inclusion of works to the east-west link between the High Road and Alexandra Park along Coburg Road to create a new civic boulevard. The cluster of buildings proposed here are intended to act as a signal to the connection between Wood Green and Alexandra Park, creating legibility within the area. However, access to Alexandra Park is via a circuitous and unattractive route around the Filter Beds site and via the Penstock tunnel, which also raises some concerns over a sense of safety. The proposed development is largely car-free so the majority of visitors from the proposed development would access Alexandra Park on foot. Improving access to the Penstock tunnel would be extremely beneficial, but it is vital it is combined with improvements to the lower section of Alexandra Park to cope with additional footfall. There also needs to be serious consideration of issues of safety and the lighting of this access point, whilst also ensuring there is a balance to protect the dark sky in the Park at night.</p> <p data-bbox="573 1076 1346 1179">4.2. Again, the Trust would like to be involved in the discussions about this route and what contributions will be made available to support its upgrade.</p> <p data-bbox="573 1222 1005 1252">5.0. Building Height and Views</p> <p data-bbox="573 1295 1365 1398">5.1. The height of the development will fundamentally change the sightlines from the Park and will make it feel more enclosed, especially from the Lower Fields. This is</p>	

Stakeholder	Question/Comment	Response
	<p>an inevitable consequence of the wider strategic development of Wood Green, which will raise building heights generally.</p> <p>5.2. It is noted that the detailed planning application states that the residential units in development zones A, B and C will range from 2 - 15 storeys. The Design and Access Statement sets out the preferred scheme for the detailed application as capped at a maximum of 19 storeys.</p> <p>5.3. The outline planning application however, does not state the range of height in storeys, and instead is requesting heights of up to 103.90mAOD. AOD means Above Ordnance Datum. Usually Mean Sea Level is used for the datum. The site is approximately 25m above MSL. It would have been helpful if the applicant were more explicit in their proposals regarding height, and consistent in their use of language, particularly given that there are considerable sensitivities around this issue.</p> <p>5.4. Page 69 of the Design Code states:</p> <p>“The planning parameters allow for notable variation between the Illustrative Masterplan and the Maximum Planning Parameters to allow flexibility in the placing of taller elements at Reserved Matters Stage.”</p> <p>5.5. Page 119 of the Design and Access Statement states:</p> <p>“The northern portion of the site is identified as an area</p>	

Stakeholder	Question/Comment	Response
	<p>suitable for taller, landmark buildings due to its proximity to the High Road, proposed Civic Boulevard and additional identified development sites.”</p> <p>5.6. Whilst the Trust appreciates that this area of the site is part of the outline application, there are already concerns that building heights of 19 storeys are extreme. The Trust would urge the Council to consider the impact of the request for maximum building heights that are over and above 19 storeys as set out in Parameter Plan 5 (in Zone H, the maximum building heights are shown as 103.9mAOD and 91.1mAOD). Should Reserved Matters applications come forward with buildings higher than 19 storeys, the Trust would be obliged to formally object on the grounds of appearance and scale.</p> <p>5.7. The completed development will generate a significant visual change within part of the wider setting of Alexandra Park through the introduction of buildings that are larger in both form and scale than those currently existing in the mid-ground view from the South Terrace and the Lower Field. APPCT is keen to ensure that this impact will be thoroughly assessed and adequately mitigated against. APPCT has previously suggested to the developer that buildings facades facing the Park should be staggered and include some ‘greening’ treatment (such as green walls etc.) to mitigate the visual impact of the buildings with the surrounding aspect.</p> <p>5.8. The site is in close proximity to four protected views corridors, with one directly crossing the site. Whilst a</p>	

Stakeholder	Question/Comment	Response
	<p>Visual Impact Assessment has suggested that key views will not experience detrimental impacts due to the proposed development, views towards the site from the Palace will result in a considerable visual change. The document states that views towards the site are 'heavily obscured by the dense tree canopy present in Alexandra Park'. This is true for some periods during the year, but not all.</p> <p>5.9. Finally, the impact of a new development and new residents could increase the pressure the Trust faces to manage its activities to suit the local residents rather than meet the needs of the Trust, e.g. times of operation, frequency of events and level of alterations we make to peoples 'normal routes' especially for events in the Park. Subsequently, the Trust would encourage the developer to build into their sales contracts and documentation information to purchasers about the Park and Palace to ensure awareness that APPCT is an entertainment venue not 'just a park' (to avoid complaints to APPCT from new residents). Precedents for this exist, for example at Wembley Park.</p>	
<p><b>Haringey Cycling Campaign</b></p>	<p><u>Parameter Plan 7 access and ground movement</u></p> <p>We welcome the provision indicated for the N/S principal pedestrian and cycle movement and the E/W secondary pedestrian and cycle movement also shown. The landscaping drawings to not presently give enough detail to comment on safety and other aspects of this provision, so we suggest additional details be provided and we would be pleased to comment. It is important agreement</p>	<p>Noted – a range of detailed landscaping plans were submitted by the applicant showing materials for the main routes within the detailed scheme. Further details will be required as part of reserved matters for the outline scheme. It is unclear what further details are required. No specific safety concerns were raised by the Council's highways</p>

Stakeholder	Question/Comment	Response
	<p>is reached with the developer for these routes to be freely accessed by the public and integrated to local networks, with coordinated signage.</p> <p><u>C1 Floor Plan GF</u></p> <p>We commented previously, for the previous application which had the same plan, on the cycle parking located inconveniently at a long distance from the entrances and with much of it accessed by negotiating a gap between parked cars. We are disappointed to note that even after raising this in a meeting with the developers, there has been no improvement in the layout. We assume the other parts of the development have similar problems.</p> <p>We previously commented that the external cycle parking should not be accessed through the rubbish collection point. We trust this has been resolved.</p> <p><u>Car Parking (overall provision)</u></p> <p>Car parking spaces have increased from 251 at outline planning stage to 425 in the current application. The development has a PTAL of 4 so the starting point should be minimal car parking. In our view there is too much car parking provided. Providing this amount of space for car parking is likely to worsen traffic problems in the area and it will also push up the necessary sale price of the units, reducing affordability.</p> <p><u>Cycling Level of Service Audit</u></p>	<p>and transportation officer.</p> <p>The rubbish collection point is in a different area to the external cycle parking area.</p> <p>Noted – the amount of parking spaces is policy compliant for the mix of uses proposed which form part of the scheme.</p>

Stakeholder	Question/Comment	Response
	<p>None of the 3 main cycle routes serving the development (Mary Neuner Rd, Hornsey Park Road and Turnpike Lane) are given a 'critical fail' in their CLOS scoring, however all these routes go through the Turnpike Lane/Wightman Rd junction, which was designed as part of a multi-lane road construction scheme, abandoned many years ago. This junction should give all these routes a low score. Remarkably the report concludes that the junction of Turnpike Lane/Wightman Road is fine for average cyclists and is not a barrier to more people cycling. This is definitely not the conclusion we would reach - a characteristic of roads and junctions adjoining this site is of fast, aggressive traffic and dangerous junctions that are difficult to navigate safely. The proposed interventions will not make a meaningful difference to these problems.</p>	<p>Financial contribution of £405,280 (four hundred and five thousand two hundred and eighty pounds) is required as part of the legal agreement towards a package of measures to improve walking and cycling conditions on the following key routes identified in the planning application and reviewed by the Council's transport and highways officer.</p> <ul style="list-style-type: none"> <li>a) Penstock Foot path</li> <li>b) Hornsey Park Road</li> <li>c) Mayes Road</li> <li>d) Coburg Road, Caxton Road/Caxton Road to Wood Green High Road.</li> </ul>
<p><b>Fountain Area Residents' Association</b></p>	<p>Concern at possible negative impact on Lordship Recreation Ground from changes to Moselle Brook and at the lack of green space in the east of the borough. Proposals should include significant measures to enhance the borough's environment and opportunities should be taken to the improve water quality of the Brook.</p> <p>Any permission must be conditional on de-culverting the River Moselle across much of the site (as proposed by Parkside Malvern RA and Thames 21). Advantages to</p>	<p>Noted – although works etc. to the Moselle does not form part of the applications, a 'buffer' zone of landscaped open land has been provided in order to facilitate any works to the Moselle in the future.</p> <p>Noted - as above</p>

Stakeholder	Question/Comment	Response
	<p>opening up the river include helping prevent floods, creating vital green spaces and improving recreational value, promoting biodiversity and enhancing people's connection with the space.</p>	
<p><b>Neighbouring Properties</b></p>	<p><b>Excessive building height</b></p> <p>15-storeys is excessive and would represent a blot on the landscape and adversely affect views. The maximum height should be 9-storeys as previously approved.</p> <p>Buildings would not fit in and stick out along the skyline.</p> <p>Excessive height would provide an intimidating backdrop for people living in two-storey houses.</p> <p>Proposals are against area height restrictions.</p> <p>Proposed buildings are higher than shown to local residents.</p> <p><b>Adverse effect on Views</b></p> <p>Little consideration given to surrounding streets (that would become hidden) or to views/vistas from the surrounding area.</p> <p>Any buildings over 4 or 5-storey would be out of keeping with the area and obstruct views from across the park</p> <p>Failure to provide view of Alexandra Palace called for in the AAP.</p>	<p>Noted: This is a revised scheme. Higher density developments are encouraged by planning policies where a site can accommodate high buildings. This site is able to do so and the high buildings are located away from the existing residential properties.</p> <p>A number of consultation exercises have been undertaken enabling residents the opportunity to observe the revised scheme and the buildings have not increased following the public engagement exercises.</p> <p>Full consideration has been afforded to views etc. and these have been considered acceptable. No strategic or important designated local views are obstructed</p> <p>Although the development would introduce higher buildings than immediate surrounding area, planning policies support more intensive density</p>

Stakeholder	Question/Comment	Response
	<p>Loss of sight lines across the park ranging from pleasant glimpses to longer views</p> <p><b>Loss of residential amenity</b></p> <p>Loss of privacy (proposed buildings too close to existing homes) and negative effects on health and well-being of existing residents.</p> <p>Proposals would result in overlooking of back gardens (too close to existing homes) – overbearing and intimidating. The proposed building line should be no closer than that set by the September 2011 planning permission.</p> <p>Excessive heights would result in loss of daylight and sunlight and overshadowing.</p> <p><b>Increased transport and parking pressures</b></p> <p>Turnpike Lane, Wood Green and Finsbury Park Stations and the lines that serve them are already struggle with the number of commuters. Buses and the Overground are equally overcrowded. Safety for travellers is at risk from increased crime/antisocial behaviour.</p> <p>Proposals would worsen traffic on Hornsey Park Road and Tottenham Lane.</p>	<p>developments, which result in high buildings. The site would consist of a variety of buildings with differing heights, which seeks to provide a transition for the existing 2 storey buildings abutting the site to the high buildings furthest away from the existing dwellings.</p> <p>All these issues have been assessed and have been addressed within the report.</p> <p>The applications have been submitted with a BRE assessment and there would be no material loss of amenity on surrounding residents.</p> <p>Transport impacts have been assessed by Transport for London and the Council’s Highways Engineer – appropriate conditions and mitigating measures have been included to address potential impacts.</p>

Stakeholder	Question/Comment	Response
	<p>Proposals would increase car parking requirements in the area – with parking over spilling in to local streets.</p> <p>Proposed additional residential car parking (425 rather than previous 251) would result in additional traffic. The area is congested and suffers from poor air quality and the scheme should be car-free. There is surplus off-street car parking in the area and also car club spaces</p> <p>The proposed underground car parking would add to building costs (and hence higher prices).</p> <p><b>Ability of local public services to cope</b></p> <p>Concern at the ability of local public services to cope with large number of new residents (GP surgeries, nurseries, schools etc.)</p> <p>Lack of assessment of impact on area and additional infrastructure to deal with increased traffic, policing, school places etc.</p> <p>The area is already struggling to cope with other new development.</p> <p>Thames Water has identified problems.</p> <p><b>Adequacy of affordable housing offer</b></p> <p>Proposed 15-storey building of over 100 units without</p>	<p>As above</p> <p>Underground parking preferred in order to maintain visual amenity of the area. Cost is not a planning issue</p> <p>CIL and appropriate section 106 contributions will mitigate these points raised</p> <p>This is a specific site allocation and has been factored in to the long terms vision for Wood Green – new development is supported.</p> <p>Thames Water has recommended conditions to mitigate any issues and have been included.</p>

Stakeholder	Question/Comment	Response
	<p>any affordable housing contravenes the Council’s policy to secure 40% affordable housing. Request for details of number of units, exact breakdown of proposed affordable housing (percentage and type/ tenure of affordable housing).</p> <p>Inadequate proposed provision that is not policy complaint – 220 Shared Ownership and 179 Social/Affordable Rent (29% by hab room, 23.5% by unit). Only 10.3% of dwelling are at Social/Affordable Rent.</p> <p>Uncertainty as to whether rented properties would be a ‘social’ or ‘affordable’ rent.</p> <p>The area needs a minimum of 50% really affordable rented housing – with this being provided by the Council.</p> <p>Proposals will inflate prices/rents nearby and force out poorer renters and would-be homeowners (social cleansing).</p> <p>Reduction in proposed amount and type of affordable housing is unacceptable.</p> <p>Need ‘key worker’ housing.</p> <p><b>Poor quality private flats</b></p>	<p>The proposal would provide ??% affordable housing units of which xx are socially rented and xx shared ownership,</p> <p>The applications supported by a viability report – independently assessed and agreed. The provision is acceptable</p> <p>A mix of the two has been agreed</p> <p>As above – not provided by the Council but to be managed by a Registered Provider</p> <p>Not a planning issue</p> <p>There is an increase of affordable housing as compared to the previous extant planning consent scheme – viability assessment supports the amount of affordable housing proposed The legal agreement will secure affordability levels in accordance with</p>

Stakeholder	Question/Comment	Response
	<p>A large number of the proposed private flats are 'Manhattan' flats one-bed/person micro flats. This is 'inhumane' and is about maximising profit.</p> <p><b>High density</b></p> <p>Cheap high-density housing is a short fix that will lead to expensive problems in the future. People are happier living/working in lower density developments (fewer mental/physical health problems).</p> <p>Higher density and building height is completely at odds with broader plans to regenerate Wood Green – density and scale needs to be at a level where the area can cope.</p> <p>Getting permission and then proposing an increase in scale of 50% is deceptive.</p> <p><b>De-culverting of Moselle Brook</b></p> <p>Any permission must be conditional on de-culverting the River Moselle across much of the site (as proposed by Parkside Malvern RA). Advantages to opening up the river include helping prevent floods, creating vital green</p>	<p>current planning policy.</p> <p>Room size standards are acceptable and policy compliant.</p> <p>High density in well located areas supported by planning policy – good living environment in which to live for future occupiers – this is covered in the main body of the report</p> <p>High density development in Wood Green acceptable due to its location and excellent transport links – conforms with the vision of the Site allocations DPD and the draft Wood Green AAP</p> <p>This is a revised scheme and assessed against current planning policies and individual merits.</p> <p>Applicants explored this option and yet this isn't a feasible option until other</p>

Stakeholder	Question/Comment	Response
	<p>spaces and improving recreational value, promoting biodiversity and enhancing people’s connection with the space.</p> <p>Associated SuDS features would help reduce impact of flooding downstream.</p> <p>Thames Water has a commitment to remove sources of pollution by 2019.</p> <p><b>Poor public realm/building design</b></p> <p>Proposed buildings are out of context and would adversely affect character and appearance of the area.</p> <p>Proposed materiality is unclear – how have designs been developed to integrate into existing fabric of Wood Green? What historical, cultural, artistic and community aspects have been included in conceptual ideas and design processes?</p> <p>Proposed buildings are too close to the boundaries of the site.</p> <p>Inadequate/small publicly accessible spaces which does not address lack of accessible and safe public open space in the area.</p> <p>The excessive scale of the proposals would damage the cohesion of the local community. Lack of clear proposals for decent, well-planned and integrated high-quality public art.</p>	<p>mitigation measures have been undertaken. A ‘buffer’ has been created as part of the scheme so that works could be undertaken in the future</p> <p>Conditions have been included to address SuDS</p> <p>Noted</p> <p>All these issues addressed within main body of the report</p> <p>The planning agreement will secure measures contained in the Cultural Strategy (October 2017) as well as a</p>

Stakeholder	Question/Comment	Response
	<p><b>Loss of Chocolate Factory &amp; Unrealistic cultural strategy</b></p> <p>The building provides an array of creative and educational services and is the main focus for creative and performing arts and provides affordable rents for small businesses. It provides services to local people who would otherwise be unemployed/vulnerable. It provides educational and cultural uses for young people as well as those with special needs or learning difficulties. Demolition would be catastrophic and against what the community hold dear. It would also impact negatively on loss of local businesses who supply the building (including independent shops and restaurants). The Council should be supporting/encouraging the existing activities, not getting rid of a gem.</p> <p>Unless there is funding and infrastructure for cultural events (and ability for local people to help shape these), the ambition to foster a sense of local pride and community will not be realised.</p> <p>More likely to attract anti-social behaviour than create a community hub (increased drug dealing rather than strangers sharing meals).</p> <p><b>Negative effect on Wood Green Town Centre</b></p>	<p>further update. Details of landscaping, including public art will be required as part of reserved matters for the outline scheme.</p> <p>This proposal does not include the Chocolate Factory site</p> <p>A</p> <p>s above. The scheme does not propose cultural events – however the proposed uses and new public open spaces would be able to facilitate community related activities in the future.</p> <p>The development has been considered by Design Out Crime officers and appropriate conditions have been included to ensure a secure and friendly environment.</p>

Stakeholder	Question/Comment	Response
	<p>The proposals would provide further underutilised retail space, whereas what is needed is upgrading of the town centre and better marketing.</p> <p><b>Anti-social behaviour</b></p> <p>Proposed increase in number of secluded places will provide additional places for alcoholics and drug dealers to hang out (increasing risk to children at Creig City Academy and Heartlands High School).</p> <p>The proposed new pedestrian routes could increase anti-social behaviour.</p> <p><b>Negative impacts during construction</b></p> <p>The Avenue is not fit to accommodate large spoil vehicles which bounce over speed bumps and make houses shake.</p> <p>Need to stop construction vehicles from using local streets.</p> <p>Noise and dust pollution during construction.</p> <p><b>General negative environmental effects</b></p> <p>Proposals would lead to increased noise, poorer air</p>	<p>A number of uses are proposed to allow market flexibility, which will complement the town centre rather than detract from it.</p> <p>All addressed as above</p> <p>Appropriate conditions have been included to mitigate against such impacts.</p>

Stakeholder	Question/Comment	Response
	<p>quality/pollution and litter.</p> <p><b>Consultation on hybrid planning application</b></p> <p>Mixing outline and detailed elements is unhelpful – difficult to review, intentionally confusing, with changes from previous scheme not immediately apparent.</p> <p>Application bears very little relationship to plans shown to residents.</p> <p><b>Adequacy of cycle parking</b></p> <p>Detailed information on cycle parking (Appendix U) is unavailable. Concern at spaces being provided in basements and inaccessible and/or within flats themselves – competing for limited storage space.</p> <p>Not enough cycle parking.</p> <p><b>Failure to meet zero carbon obligation</b></p> <p>Energy Statement states that in addition to on-site measures, the development would provide space for the Wood Green Energy Centre for which CO2 savings are likely to be greater than the residual CO2 from the proposed development – therefore the proposed development is zero carbon. However, no PV arrays are proposed (these should be provided before off-setting).</p>	<p>The proposal has been accompanied by an EIA and appropriate conditions have been included to address these impact.</p> <p>This is not an unusual way in which to submit a planning application for such a sizable site. Further, a number of public consultations have been undertaken in order to explain the scheme to local residents.</p> <p>There is a significant number of cycle parking spaces, which is policy compliant. The location of the cycle storage has been agreed with transport officers.</p> <p>This has been addressed in the main body of the report</p>

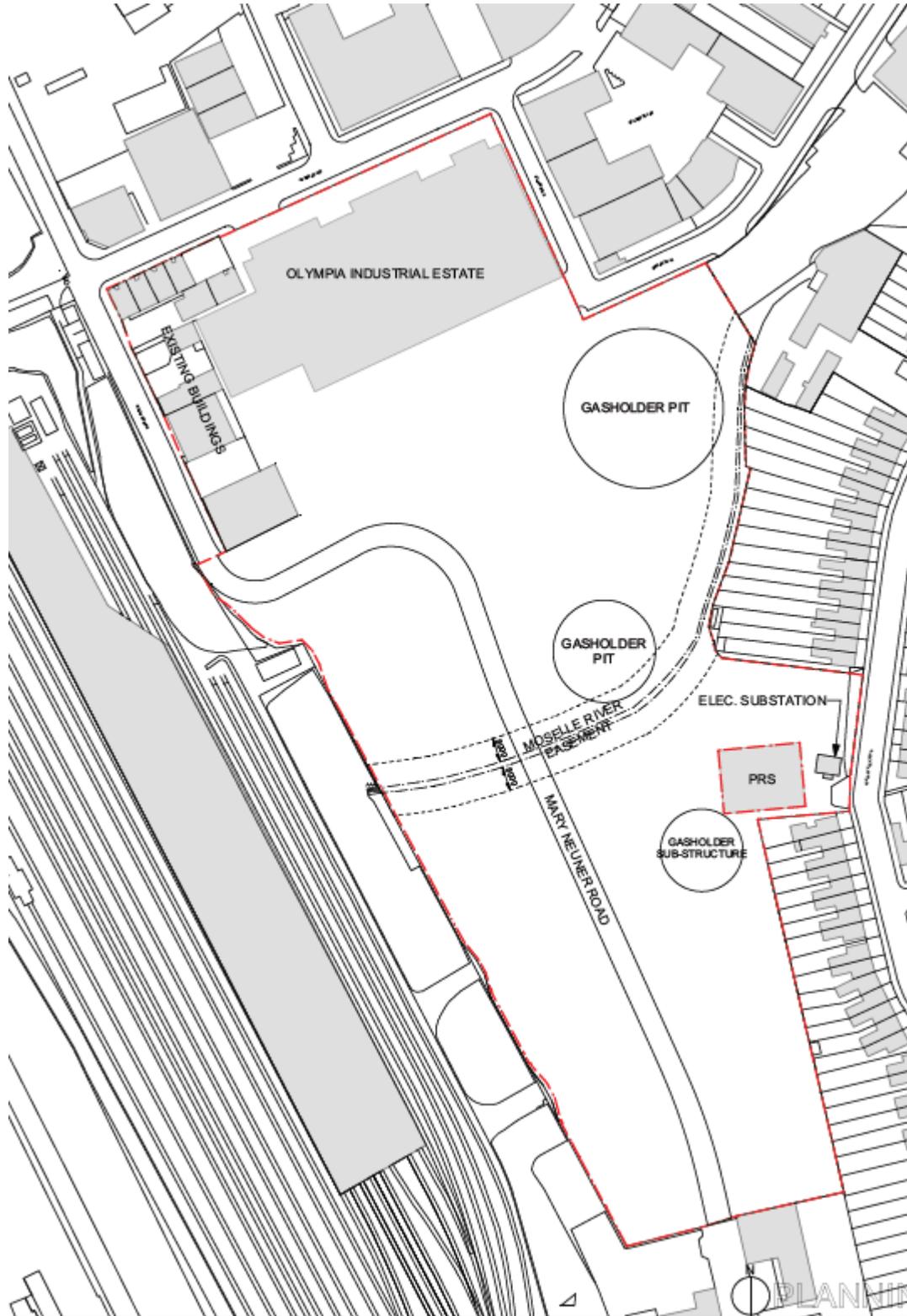
Stakeholder	Question/Comment	Response
	<p>Reliance on space for an energy centre that would be required in any event by planning policy would reduce net emissions of any other development which connects to it – but would not offer additional reductions for this site. This should be challenged.</p> <p><b>Loss of business</b></p> <p>Automerc Service Ltd (car maintenance business) should be relocated to viable alternative premises within its existing customer catchment area and appropriate compensation agreed. The Council should not overlook the importance of private sector business which rely on commercial premises (such as at Western Road). Automerc has recruited and trained apprentices from nearby schools in association with the North London Garage Group Training and after training, employees have move on to provide a source of skilled staff for other local companies.</p> <p><b>Adverse impact on business</b></p> <p>Electoral Reform Services (ERS) are located at 33 Clarendon Road near the southern end of the site. ERS is a 24-hour operation and it is concerned that the proposals would result in objections to its operation from new residents in terms of (1) noise and disturbance (2) overlooking and security and (3) vehicular access. ERS has proposed solutions to overcome its objections including:  Pulling residential away from the boundary, enclosing its yard or locating business space on ground floor. The</p>	<p>Notes – a number of new uses are proposed as part of the development. Further, section 106 clauses seek a contribution and participation in employment initiatives.</p> <p>The applicant has responded directly to these concerns and the plans have been amended. Accordingly, ERS has no withdrawn its objection to the scheme and now supports the scheme given the subsequent amendments and the</p>

Stakeholder	Question/Comment	Response
	<p>applicant considers these impracticable, so ERS wants mechanical ventilation/fixed windows in Blocks A1, A2 and B1, no balconies and a 2.5m high wall built.</p> <p>Provision of screening to protect privacy/safeguard election counts.</p> <p>Changes to Controlled Parking Zone restrictions on Mary Neuner Road to allow for ERS lorries to continue to wait up on street and assurances that the proposals allow articulated lorry access to its site.</p> <p><b>Negative impact on development potential of adjoining land</b></p> <p>The proposed increase in height of Blocks D/E and H from 8 to 18-storeys, the proximity of these to neighbouring land and the number of active windows and balconies may have a negative impact on the future development of land at Nos. 1-4 Bitten Place. Inadequate assessment of daylight and sunlight impacts, which should have considered development potential. Proposals would have a prejudicial impact on the deliverability and viability of development of Nos. 1-4 Bitten Place and there is no masterplan that demonstrates otherwise. As such, the proposals are contrary to Site Allocation Policies SA18, SA19, SA20, SA21 and SA22 and Policy DM55.</p>	<p>provision of screening which is agreed.</p> <p>These points are addressed in the main body of the report</p> <p>No material levels of overlooking would occur</p> <p>Considered and addressed by transport officers</p> <p>The proposed scheme has been designed in order to not prejudice future development of surrounding sites.</p>

Stakeholder	Question/Comment	Response
	<p data-bbox="569 235 1031 267"><b>Infringement of Human Rights</b></p> <p data-bbox="569 305 1367 451">The proposals would infringe rights as defined by the Human Rights Act 1998 – Article 1 (right to enjoy property peacefully) and Article 2 (right to privacy, family life and home).</p>	<p data-bbox="1404 380 1986 522">These particular issues would not be compromised by the proposed scheme and has been addressed within the main body of the report</p>

## Appendix 2: Plans and Images

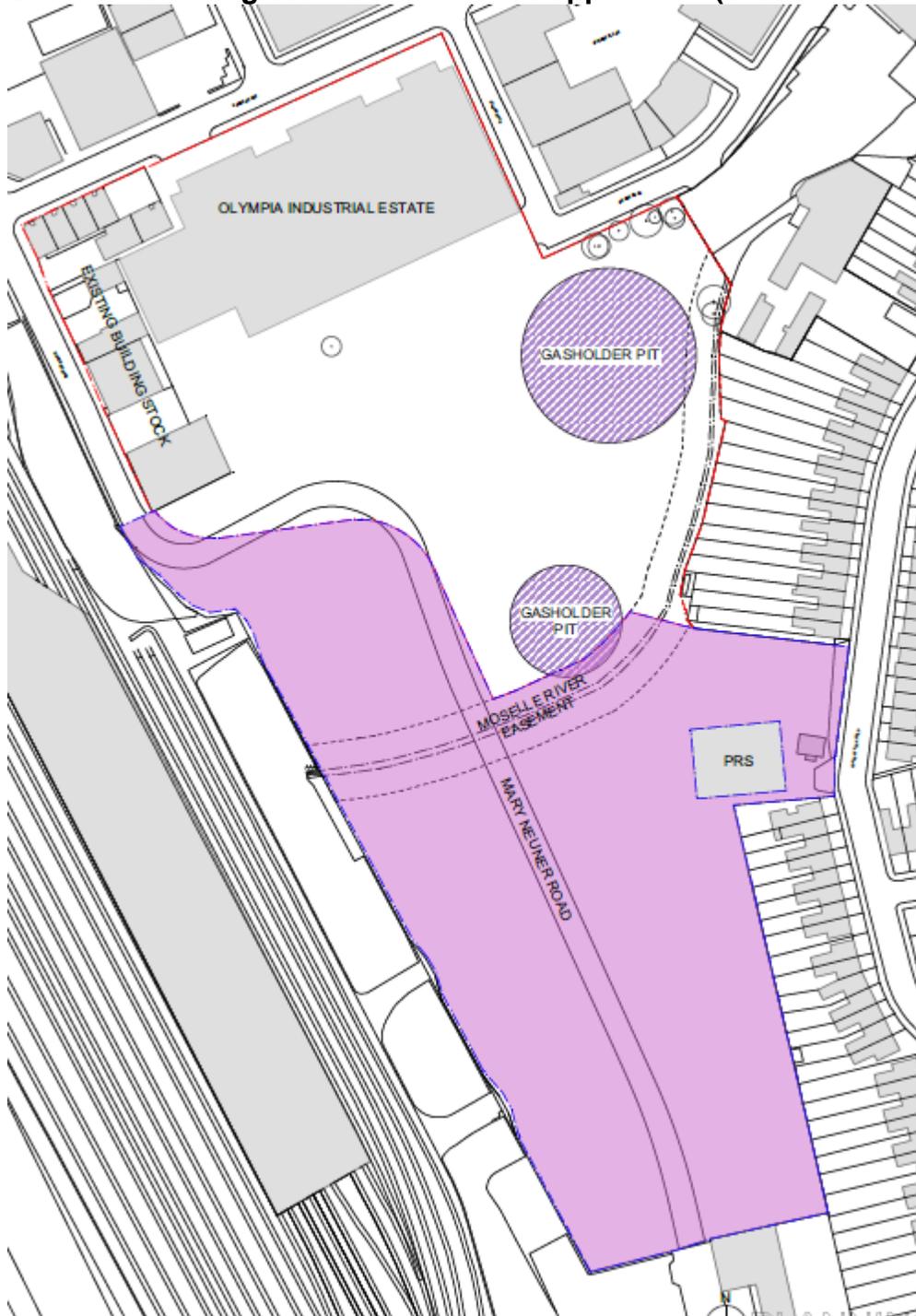
### Site Location Plan



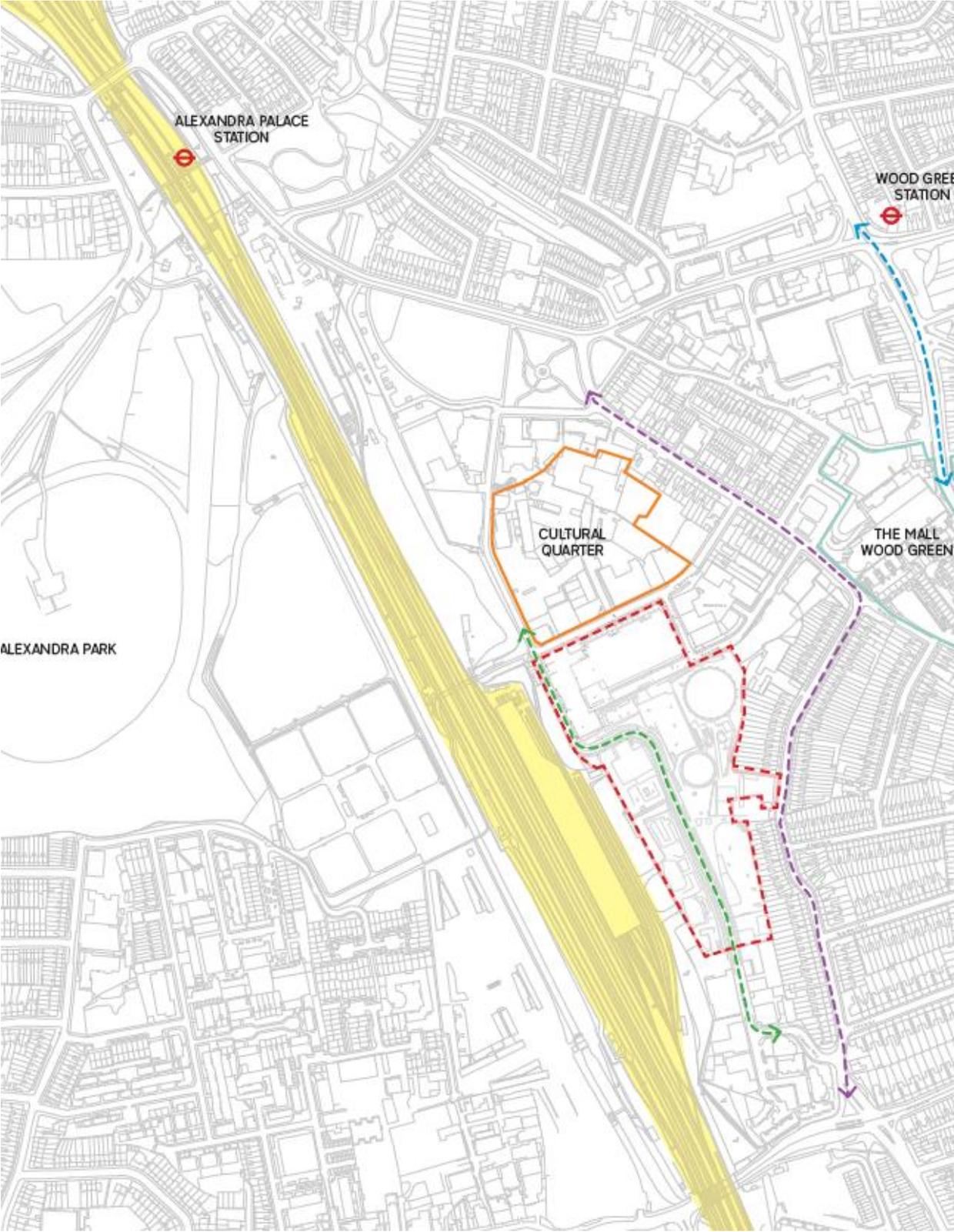
**Proposed Site Plan**



Site Plan showing outline and detailed application (shaded detailed application)



**Context**



**Overview of development:**



Heights of Illustrative Masterplan  
(heights exclude undercroft and basement levels)

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## Aerial Photograph



Aerial view of Clarendon Road site

CGI'S





## **Appendix 3A: QRP Note – 22 February 2017**

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

#### **Report of Formal Review Meeting: Clarendon Square (Gas Works)**

##### **Panel**

Peter Studdert (chair)  
Esther Kurland  
David Lindsey  
Tim Pitman

##### **Attendees**

John McRory London Borough of Haringey  
Richard Truscott London Borough of Haringey  
Adam Flynn London Borough of Haringey  
Beth Kay London Borough of Haringey  
Gavin Ball London Borough of Haringey  
Sarah Carmona Frame Projects

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

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

##### **Confidentiality**

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

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

Clarendon Gas Works & Olympia Trading Estate, Wood Green  
Planning Application HGY/2009/0503 originally obtained by National Grid in 2009 (and subsequently amended through s.73)

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

Simon Hudspith Panter Hudspith Architects  
Gareth Hunter Panter Hudspith Architects  
Andrew Harland LDA Design  
Ashley Spearing St William Homes LLP  
Greg Brydie St William Homes LLP  
Charlie Howard St William Homes LLP  
Ben Ford Quod

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

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

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

The Haringey Heartlands area lies in the centre of the Borough and is one of the Growth Areas identified in the Council's Local Plan 2013. The area is also identified in the London Plan as an Area of Intensification. The AAP and Site Allocations (both building upon the adopted 2005 Haringey Heartlands Development Framework) establish the principle of redeveloping these existing former industrial and utility lands, to provide a mixture of housing, community, cultural and educational facilities and employment.

Following a number of earlier planning applications (2009, 2013, 2015), a full reserved matters application (ref. HGY/2016/1661) was submitted in June 2016 to approve reserved matters for the design of the original outline approval. This comprised a design for the site that sought to implement the original 2009 masterplan, which was reviewed by the QRP in March 2016. The application was approved in the knowledge that the QRP had expressed strong reservations about its design, and recommended "a fundamental rethink of the overall masterplan", understanding that this was indeed proposed. This application is that fundamentally rethought masterplan.

Council officers have been generally supportive of this new approach, and feel that this revised masterplan responds to the significant QRP concerns raised regarding the previous reserved matters scheme. However, they consider that there remains a number of issues to resolve, namely the detailed layout and alignment of blocks throughout the scheme with respect to the primary north-south street (Mary Neuner Way / Clarendon Road), the proposed commercial square and path through the ecological park to the north and the small pocket public spaces and private communal amenity spaces throughout.

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

#### *Summary*

The Quality Review Panel thanks the presenting team for the clear presentation, and warmly welcomes the approach being proposed for a re-configured scheme for the Clarendon Gas Works site. Overall, they support the emphasis on the creation of high quality places that clearly underpins the masterplan, and believe that this is a significant improvement over the previous scheme. They note, however, that the quantum of accommodation in the proposal has increased since the previous application, and believe that further work will be required to test the impact of taller elements of the scheme on the local microclimate before this can be accepted in principle. Scope for improvement remains in the development and refinement of the three-dimensional

massing of the built forms on site, as a means of shaping and influencing the character of the places contained by them, whilst also delivering high quality and functional accommodation. In addition, the panel looks forward to seeing how the architecture will develop in detail.

With regard to the detailed application site (the southern portion of the site), they feel that the overall layout is now significantly improved, and believe that the north-south street would be an attractive route for pedestrians. There is an opportunity to work through some detailed issues where scope remains for improvement. The panel notes that as the detail develops they would also like to see a clear definition between public and private spaces, in addition to careful consideration of the location and language of the entrances to the blocks, and how these work with the landscape. The panel would like to see a thorough analysis of the impact of the taller northern blocks on the open spaces immediately to the north, where overshadowing could be a particular problem. If necessary the height of these blocks may have to be reduced or reconfigured to protect the amenities of these important spaces.

The panel broadly supports the approach taken to the northern section of the site; they welcome the more intimate configuration of buildings that present offsets and glimpses leading through to spaces beyond. However, the panel is not yet convinced that the scale of the two tall buildings on the square is appropriate, and more detailed work will be required to demonstrate that this scale will not create problems of overshadowing and wind turbulence within the square and along Coburg Street to the north. An analysis of key views throughout the site and within the approach to the square will help to refine the visual and three-dimensional qualities of the proposals.

The panel would like to see design codes and parameter plans for the outline application for the north of the site. Further detail on the panel's views are provided below.

### **Detailed application area (southern section of Clarendon Gas Works site, to include Hornsey Park Gardens)**

#### *Massing and development density*

- The panel notes that the quantum of accommodation proposed has increased since the previous iteration of the scheme, and would like to gain a greater understanding of the proposed massing of the scheme, and how this relates to the spaces proposed.
- The storey heights and massing of the blocks immediately to the south of Hornsey Park Gardens (blocks 8 and 10) are potentially excessive, and could compromise the quality and amenity value of the proposed park. A reduction in height of these blocks may be necessary.
- They would therefore support further detailed scrutiny of daylight and sunlight levels within the public spaces on site, and would suggest that rather than designing to a minimum technically acceptable standard, the focus should be on what level of daylight and sunlight would be desirable for each area.

- Key views through different parts of the site would help to explore the impact of the scale and height of the buildings proposed.

#### *Place-making, landscape design and scheme layout*

- The panel welcomes the aspiration for the north-south street as a series of linked outdoor spaces that visually link the blocks across the road.
- They question whether these linked spaces will actually read as coherently as proposed, due to the busy nature of the bisecting road, the complex ground levels and sometimes limited visual access into both halves of the space.
- Whilst the panel note that some hard landscaping treatments may not be appropriate within bus routes (e.g. stone setts), they remain intrigued by the concept of hard landscaped spaces that cross the road.
- They would support further exploration of how the character of these hard spaces could be reinforced through the expression of different surface treatments, that would be acceptable in highway engineering terms.
- They note that the character of the street will also be significantly defined by the scale of the blocks lining it, by its role as a key bus route, and as the primary access for car parks and servicing.
- Further consideration of how to differentiate the public spaces would be welcomed, to explore which spaces are primarily entrance courts with larger areas of hard landscaping, in comparison to those that could offer more amenity by way of landscape provision.
- They would also support further exploration of the boundaries between the public realm and the private spaces (private or shared amenity areas).
- They note that the separation of the open space into public realm and private realm is frequently driven by the location of the primary entrance to the blocks, and would support further exploration of entrance locations to enable creation of larger private amenity areas where appropriate.
- The panel would also like further information about the nature of, and connections between, the different spaces bounded by each cluster of blocks.
- They note that some residential units may overlook shared amenity space that they do not actually have access to, as it notionally belongs to, and is accessed from, a different block.
- They would welcome exploration of whether resident children could have access from one space to the next as a linked network of amenity provision.
- They are very interested to see how the emerging landscape proposals will be further refined as part of this ongoing process.
- The panel welcomes the approach to the design of the east-west park, over the line of the Moselle; they feel that it could be a very positive part of the scheme.
- They understand the constraints that limit the potential to open up the Moselle itself, and think that inclusion of a rain garden within the park is a very good way of keeping water within the corridor in a managed way.
- The panel would like to know more about the 'backland' area of the park in terms of the relationship to the rear of the blocks abutting it. They question whether there may be issues of security, privacy and noise for any windows overlooking this backland area.

- They feel that the landscape proposals are generally very attractive, and would encourage consideration of an appropriate mechanism to ensure that they remain well maintained in perpetuity.

#### *Scheme layout, access and configuration*

- Clarity on the location and expression of the different types of entrance would be supported, to ensure that communal entrances are visually dominant and address the appropriate space, whilst private entrances located at the ground floor are more subservient.
- The revised configuration of this section of the site into smaller blocks allowing visual penetration through to smaller spaces is welcomed by the panel. They note that the current block configuration shows some blocks situated very close to each other, and would like to understand in detail how this might work, especially with regard to privacy and noise.
- The panel are encouraged by the level of thought that has shaped the practical details of the emerging design of the individual blocks; it promises a very good basis for further refinement, and should result in a very high quality of accommodation.
- In particular, they highlight the generosity in design of the communal hall spaces within the individual blocks, notably within blocks A2 and A3.
- The design of the eastern edge of the development will also require very careful consideration as it is adjacent to the rear of the neighbouring terraces along Hornsey Park Road.
- The panel note that there are practical considerations around the design of nurseries (e.g. drop-off requirements and privacy) that will need to be captured at the detailed design stage.
- They would like to understand how buses will be integrated within the scheme, to include the location and layout of bus stops, and the pedestrian desire lines that these will generate across the site.
- They would also welcome further information on the access to cycle parking, to ensure that there is adequate provision for each block, that is convenient and easily accessible.

#### *Architectural expression*

- The architecture of the blocks of accommodation within the detailed application area to the south of the site was not discussed in detail at this review, in response to the more strategic and conceptual material presented.
- The panel would like to know more about the proposed architectural expression of the buildings, to understand the different 'personalities' of the different blocks, spaces and areas on site.
- Developing an architectural language to be used across the site in different ways may help to improve legibility and wayfinding within the development.
- They note that the block at the northernmost tip of the detailed application site (sited at the bend in the road) is likely to be delivered first, and would suggest that it is in a very prominent location, almost a 'gateway' building. The detailed design of this block needs to take into account and exploit these key views. The panel would like to see the detailed proposals for this block.

### *Inclusive and sustainable design*

- The panel would like to know more about the strategic approach to energy efficiency, environmental sustainability and inclusive design for the scheme as a whole.
- They note the intention for provision of an Energy Centre on site, and would welcome further information as to how this will be integrated in detail within the current proposals.

### **Outline application area (northern section of Clarendon Gas Works site, beyond Hornsey Park Gardens)**

#### *Massing and development density*

- As noted above, the quantum of accommodation proposed has increased since the previous iteration of the scheme, and they would like to see how this has impacted upon the proposed massing to the northern end of the scheme.
- The towers surrounding the public square are in the region of 14 storeys (taller than in the previous application), and the panel suggests that this could have a significant negative impact on the microclimate and character of the space, as well as to Coburg Road to the north.
- Rigorous technical scrutiny of this part of the development (through wind tests, daylight and sunlight tests etc.) should be undertaken to demonstrate whether this scale is acceptable in principle in this location.
- They would also welcome adjustments to the overall massing of the buildings around the square; avoiding monolithic blocks through shifting and offsetting different floor plans would help to reduce down draughts whilst creating a more 'human' environment.
- The panel would encourage consideration of the strategic views; the tops of the tallest buildings on site will be seen in composition with regard to St Paul's Cathedral.

#### *Place-making, landscape design and scheme layout*

- The panel notes that the block of accommodation on the square is a visual stop on the approach from the south of the site, as the road swings away to the left. They would like to know more about how this block will frame and shape the visual approach to the square in detail.
- They would also like to see key views within the scheme; to include views north to the square, and southwards down Mary Neuner Road/Clarendon Road.
- They note that it is important to see the quality and detail of the proposed blocks within key views; the texture, massing and articulation of the accommodation has a significant impact on the space. The blank building outlines as currently shown do little to present the character of the place.
- The panel supports the intention to create more intimate spaces, using a more meandering route to open up the sequence of views, in addition to off-sets in the plan form to create glimpses.
- They note that this more intimate approach to place-making would suit the provision of 'meanwhile uses' and space for designers and 'makers', which would give a looser, less corporate feel to the spaces and blocks.
- The images of the developments and landscape design shown within the presentation were very attractive; however, the panel note that these illustrations have a very

'residential' feel to them, somewhat at odds with the intention to establish more creative (and less corporate) commercial activity.

- In place-making terms, the building heights, landscaping and detailed design of the ground and first floor building envelopes will all contribute to creating the context of either a 'commercial' or 'creative/maker/meanwhile use' setting, so these factors will need to be carefully considered at the detailed design stage.
- As noted at the previous review, an intensification of footfall is required in order to create a successful square; this will also need to be considered in the allocation of uses around, and design of the space.
- The panel welcomes the reduction in plan-size of the public square, but notes that the building heights bounding the square seem excessive, and would recommend further consideration of this (as outline in 'massing' above).
- Coburg Road is an important route at the northern boundary of the site; however, the panel express concern that it may feel like the 'back' side of the development, as there is such an emphasis on the spaces created internally within the site.
- They would like to know more about the design approach to this northernmost edge (Coburg Road) of the site.

#### *Architectural expression*

- The architecture of the blocks of accommodation within the outline application area to the north of the site was not discussed in detail at this review, in response to the more strategic and conceptual material presented.
- The panel would also like to know more about the aspirations for the architectural expression of the buildings, to understand the different 'personalities' of the different blocks, spaces and areas on site.
- They would support the inclusion of design codes and parameter plans within the outline application to provide a level of assurance and control.

#### *Inclusive and sustainable design*

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

#### *Next Steps*

- The panel welcomes the overall approach taken in the revised proposals, which represents a significant improvement over that taken in the previous application.
- They feel that more emphasis now needs to be placed on the emerging finer details of the scheme, and they highlight a number of issues that will require further consideration (in consultation with Haringey officers) as these details are refined and developed further.
- They would support the use of design codes and parameter plans within the outline application to the north of the site in order to achieve a level of assurance and control; the exact requirements for which should be agreed with Haringey officers.
- They would welcome the opportunity for further review.

## **Appendix 3B: QRP Note – 20 July 2017**

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

#### **Report of Formal Review Meeting: Clarendon Square (Gas Works)**

##### **Panel**

Peter Studdert (chair)  
Ed Jarvis  
Tim Pitman  
Chris Twinn

##### **Attendees**

John McRory London Borough of Haringey  
Adam Flynn London Borough of Haringey  
Richard Truscott London Borough of Haringey  
Beth Kay London Borough of Haringey  
Pippa Gueterbock London Borough of Haringey  
Tom Bolton Frame Projects  
Deborah Denner Frame Projects

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

Emma Williamson London Borough of Haringey  
Dean Hermitage London Borough of Haringey  
Nairita Chakraborty London Borough of Haringey

##### **Confidentiality**

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

Clarendon Gas Works & Olympia Trading Estate, Wood Green

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

Simon Hudspith Panter Hudspith Architects  
Gareth Hunter Panter Hudspith Architects  
Andrew Harland LDA Design  
Ashley Spearing St William Homes LLP  
Charlie Howard St William Homes LLP  
Ben Ford Quod

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

The Quality Review Panel provides impartial and objective advice from a diverse range of highly experienced practitioners. This report draws together the panel's advice, and is not intended to be a minute of the proceedings. It is intended that the panel's advice

may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

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

The Haringey Heartlands area is one of the Growth Areas identified in the Council's Local Plan 2013. The area is also identified in the London Plan as an Area of Intensification. The Wood Green Area Action Plan (AAP) and Site Allocations (both building upon the adopted 2005 Haringey Heartlands Development Framework) establish the principle of redeveloping these former industrial and utility lands, to provide a mixture of housing, community, cultural and educational facilities and employment.

Following a number of earlier planning applications (2009, 2013, 2015), a full reserved matters application (ref. HGY/2016/1661) was submitted in June 2016 to approve reserved matters for the design of the original outline approval. This comprised a design for the site that sought to implement the original 2009 masterplan, and was reviewed by the QRP in March 2016. The application was approved in the knowledge that the QRP had expressed strong reservations about its design and had recommended 'a fundamental rethink of the overall masterplan', understanding that a rethink was indeed proposed. The current scheme has resulted from that work, and was first reviewed by the QRP in February 2017. Council officers are generally supportive of the new proposals, and feel that the revised masterplan responds to the concerns raised by the QRP regarding the previous reserved matters scheme. They support the significant increase in the quantity of development proposed, especially the increase in employment space on the site.

However, planning officers continue to challenge the applicants on a number of areas, particularly the impact of the scheme's density on the amount and design of the public space provided. They are seeking a clearer distinction between public and private realm, and wish to ensure streets and public spaces provide a liveable environment. This will require sufficient daylight and sunlight provision in these spaces, and wind levels that do not undermine comfort.

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

##### *Summary*

The Quality Review Panel welcomes the quality of the ideas being applied to the Clarendon Gas Works site, and the design ambition that is apparent. It believes that the revised masterplan represents a significant improvement on the previously consented scheme. In broad terms, the panel supports the proposals for the southern part of the site, where a detailed planning application is proposed, although some concerns remain about the negative impact of blocks A4 and B4 on the open space to the north. It offers some detailed comments on both the architecture and landscape of this section of the scheme, to inform design development. However, whilst supporting the overall ambition for a high density mixed use development, the panel continues to think that the

increased quantum of development proposed for the northern section of the site, where an outline application is to be submitted, presents a significant design challenge. The panel remains concerned that the scale and massing of this part of the scheme compromises the quality of the public realm, and it therefore repeats its previous recommendation that further work be carried out to test the impact of taller elements of the scheme on the local microclimate, and on the character of this part of the development. A model of the proposed development, set in its wider context, would be a helpful tool to test different massing options and to assess whether a reduction in floor space will be necessary to make the proposal acceptable. Further detail on the panel's views is provided below.

### **Detailed application area (southern section of Clarendon Gas Works site)**

#### *Massing and development density*

- In broad terms, the panel supports the scale and massing of development proposed in this part of the site, which promises to create a lively and varied residential neighbourhood with opportunities for significant landscaping.
- However, the panel has previously raised concerns that the heights and massing of blocks A4 and B4 immediately to the south of the proposed east-west park will compromise its quality. After testing of daylight and sunlight levels it still feels that the height of the buildings is potentially a problem in terms of both sun and wind, and that their over-dominant scale will significantly reduce the amenity value of the main public green space in this development.
- The panel would encourage a reduction in the heights of these blocks, redistributing some or all of the accommodation elsewhere within this phase of the scheme if it can be satisfactorily accommodated.

#### *Scheme layout, access and configuration*

- It is apparent that the hierarchy, character and purpose of routes and spaces through the scheme has been given careful thought.
- There is much to admire in the reciprocal relationship between landscape and architecture, which has potential to give this development a distinctive character.
- The panel expressed concern about the strategy for bicycle access and storage, which is proposed to be via rear alleyways. Given the anticipated high level of bicycle use, a more secure and convenient strategy for bicycle parking should be explored with secure bike stores located close to the main entrances to each block.
- The internal planning of the blocks needs some further refinement to avoid single aspect north facing flats.
- The panel also questioned the location of family units looking on to Mary Neuner Road, with single units at the rear overlooking private courts. It suggested reversing this configuration, to give families better access to the private spaces.

#### *Architectural expression*

- The emerging architectural expression for this part of the development is based on a strong concept of façades framing courtyard 'rooms' in the landscape, which the panel supports but thinks could be developed further.

- The current drawings and visualisations emphasise the design variety that this architectural strategy will create in the experience of moving along the street.
- As design work continues, the panel would encourage more exploration of the experience of standing in a courtyard 'room' framed by consistent façades.
- It also suggested that the different levels of façade hierarchy should have clearer design differences, expressing the intended variety more directly in the architecture.

#### *Inclusive and sustainable design*

- The panel suggested that allowing residents to leave windows securely open during the day would not be sufficient to prevent overheating. They suggested that the side panels next to the windows could be used to provide additional ventilation.

### **Outline application area (northern section of Clarendon Gas Works site)**

#### *Massing and development density*

- At the previous review, the panel raised concerns that the height of the towers surrounding the public square could have a significant negative impact on the microclimate and character of the proposed public square, on the walk beside the Moselle, and on Coburg Road to the north.
- While accepting that a high density is implied in the site allocation in the AAP, the development should nevertheless propose a townscape that is of a human scale and which creates successful and attractive streets and spaces. The panel believes that this has not yet been demonstrated.
- In particular, the panel is concerned that the relationship between building heights and the size of public spaces will create places that are oppressive in scale, as well as often being windy and lacking sunlight for a large part of the day, and that more testing is required to demonstrate their acceptability.
- For example, if the square is expected to be capable of hosting a market, then testing should ensure that sunlight, daylight and wind levels would make the environment pleasant enough for people to linger and spend time.
- The detailed design of tall buildings will also need careful thought to help mitigate down draughts. For example, colonnades projecting beyond the façades of tall buildings can help to counter wind turbulence and provide more protection for people using the space at ground-level.
- A model of the proposed development, set in its wider context, may help to explore different massing configurations, working up from the quantum of development previously permitted to test the impact of the additional massing on the quality of the streets and spaces that are proposed.

#### *Place-making, landscape design and scheme layout*

- The panel strongly supports the vision for a high density mixed used neighbourhood with a lively range of activities that will animate the streets and spaces throughout the day and into the evenings.
- The design code that is to accompany the outline application will need to give careful consideration to servicing and access strategies in order to minimise conflict between

vehicles and pedestrians in the key spaces. The code should also set high standards for hard and soft landscaping throughout this part of the development.

- The panel has previously expressed concerns that the Coburg Road frontage would feel like the 'back', with the focus of the development on internal public square. The panel continues to feel that the interface between this development and the ambitions for Coburg Road expressed in the AAP needs to be carefully considered, and that alternative locations for the main square could be explored as part of the massing exercise recommended above.

#### *Next Steps*

- The panel supports many aspects of this proposal, and welcomes the overall design vision and commitment to high quality. It continues to think the proposals represent a significant improvement over the approach taken in the previous application.

- The design for the detailed application area is developing well, and the panel has every confidence that the design team will be able to refine this in response to their comments.

- More significant design challenges remain with the outline application area of the scheme. The environmental quality and character of the proposed public spaces needs to be tested more rigorously - including through the use of a model - and decisions on height and density made on the basis of their findings.

- The panel would welcome the opportunity for further review before a planning application is submitted.

## **Appendix 3c QRP January 2018**

### Report of Chair's Review of the Haringey Heartlands Design Code

Wednesday 17 January 2018

#### Panel

Peter Studdert (chair)

Tim Pitman

#### Attendees

Emma Williamson London Borough of Haringey

John McRory London Borough of Haringey

Richard Truscott London Borough of Haringey

Nairita Chakraborty London Borough of Haringey

James Farrar London Borough of Haringey

Sarah Carmona Frame Projects

Rebecca Ferguson Frame Projects

Apologies / report copied to

Dean Hermitage London Borough of Haringey

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#### 1. Project name and site address

Design Code for Clarendon Gas Works, Wood Green (Haringey Heartlands)

Planning application reference: HGY/2017/3117

#### 2. Presenting team

Ashley Spearing St William

Matthew Rees St William

Neil Wells Quod

Simon Hudspith Panter Hudspith Architects

Gareth Hunter Panter Hudspith Architects

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

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

#### 4. Planning authority's views

The Haringey Heartlands area lies in the centre of the borough and is one of the Growth Areas identified in the Council's Local Plan 2013. The area is also identified in the London Plan as an Area of Intensification. The 4.83 ha application site forms part of the wider Haringey Heartlands area and is situated on land between Hornsey Park Road, Mayes Road and the London Kings Cross / East Coast Main Line, Clarendon Road and Coburg Road. The site is currently characterised by cleared, derelict land.

The Wood Green AAP includes this application site as 'SA18: Clarendon Road'. Outline planning permission has previously been obtained for the site in 2009 (with approval of Reserved Matters in 2016). Approval is currently being sought for a significantly revised masterplan, which includes a Design Code, Parameters Plans and a Development Specification. The Design Code relates to the outline element of the revised masterplan, which is located to the north of the overall site. Officers consider that the submitted Design Code, relating to the northern outline portion, will provide clear guidance on the intended scale and character of the individual buildings and spaces between them in the northernmost masterplan area, and will help to ensure continuity across the different site areas. Officers are keen that a good precedent is set within the Design Codes, that could also have an influence on neighbouring development sites in the future. The Design Code will be an approved document, and it is intended that it will enable a level of flexibility for the development in future, whilst tying down the standards and qualities that are required within the proposals. They welcome the panel's views on how to ensure that the codes and parameters have sufficient weight in order to achieve the balance between flexibility, quality and continuity.

## 5. Quality Review Panel's views

### *Summary*

The outline planning application for the northern part of the Haringey Heartlands is highly ambitious in the scale and density proposed for this mixed-use quarter, and the Quality Review Panel believes that the success of the development will very much depend on the detailed design quality of the individual buildings, their relationship to each other and to the spaces that they enclose, as well as on the careful integration and management of the mix of uses proposed. In this context, the Quality Review Panel welcomes the production of a Design Code covering this part of the site, and it believes that it outlines a well-considered set of design ideas to guide the detailed development of the site. The emphasis that this document places on high quality and creative design will be essential to successfully deliver the quantum of development proposed. As the panel noted at the review of the revised illustrative masterplan in July 2017, the proposals are a significant improvement upon the previous (consented) masterplan. Scope remains, however, to improve the clarity of: allowable floor-area ratios within individual plots; three-dimensional modelling within the 'minimum height' zone; and microclimate requirements.

Subject to resolution of concerns regarding zone floor area ratios, a co-ordinated phasing strategy, and architectural design overview of subsequent phases, the panel

offers support for the Design Code and related documents.

Further details on the panel's views are included below. It was unable to consider the full scope of the Code in detail due to time limitations within the review; consequently, panel comments are focused at a more strategic (rather than detailed) level.

#### *Massing and development density*

- The panel notes that Parameter Plan 5 establishes the heights and frontages within the application site; however, there is no corresponding limit or guideline / range for floor area or plot ratio on each plot, to govern how the total accommodation will be distributed across the site, although the need for this is stated in paragraph 2.3.10 of the Code.
- It would therefore like to see a tighter definition of the accommodation achievable or anticipated on each plot in the Development Specification to formalise the appropriate distribution of accommodation between early and later phases. This will help to avoid potential inflation of total development quantum in the future.

#### *Landscape and public realm*

- The panel was not able to comment in detail on the landscape and public realm elements of the code – but these seem to promise a high quality environment.

The panel highlights that there were a number of outstanding comments from the review of the illustrative masterplan in July 2017, including: servicing arrangements, the interface between residential and employment uses, and the nature of the east-west pedestrian / cycle route.

- As the streets are quite narrow, there will be a need to carefully coordinate elements such as electricity, water, storage, street furniture etc. to avoid cluttering and obstruction.
- For example, lamp posts in narrow streets should be avoided where possible, so the design of street lighting should be carefully considered (and integrated) at an early stage.
- If a market is proposed within the main public space, then provision of services and ancillary space for storage should be addressed.

#### *Microclimate*

- The panel would strongly encourage higher aspirations within the Design Code (and related documents) for the standards of daylight and sunlight expected within the key spaces. For instance, the minimum requirement for two hours of sunlight at 21st March over 50% of the main public square, set out in para 2.3.9 of the Code, seems low for such an important space. In general, reliance on achieving minimum BRE standards would be unacceptable for a development of this quality.
- In addition, the east-west pedestrian / cycle route appears to have a very narrow and deep street section that faces onto the prevailing wind direction, which could result in tunnel-effect wind problems.

- The panel notes that measures to counteract wind issues have been included in the code document (offsets and plinths within the facades), and that an indicative model has had wind tunnel tests. However, it suggests that consideration (and mitigation) of wind issues needs to be an ongoing priority as the detailed design of each block commences.

*Strategic delivery, management and forward planning*

- There is an urgent need for a three-dimensional model of the AAP area to be produced, so that the overall density can be clearly established and envisioned by the Council.
- Strategic co-ordination of phasing within the overall Clarendon Gas Works site will be required to ensure that quality and design standards are not compromised between phases, and across plots and development parcels. The panel notes that, as there is a shared basement within the northern section of the site, this may necessitate these phases coming forward together.

The panel stresses the need for co-ordinated management and servicing across the different sites. It suggests that a single managing body should have control of the management across the whole Clarendon Gas Works development, and that this should be formally established within the process.

- The panel feels that it is critically important for the design team to have continued involvement, after planning consent has been achieved, to ensure quality and consistency at the detailed design and construction stages.
- It would like to see retention of the current architects as 'executive architects' to have an overview role in the development, whilst enabling a diversity of approach in some of the individual plots through the inclusion of other architectural practices.

*Next Steps*

The panel support approval of the Design Code (and related documents) subject to reassurance that:

- Indicative zone floor area ratios / limits for individual plots will be included within the Development Specification.
- A detailed phasing plan showing how / when the different Reserved Matters applications will come forward is established within a Section 106 Agreement.
- Provision for architectural design overview of the overall scheme by Panter Hudspith Architects is established within a Section 106 Agreement.

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

A Development Management Forum for the development proposal for the Land at Haringey Heartlands, was held on 29 June 2017.

12 local residents were in attendance.

The issues and questions raised by local residents were as follows:

- Which buildings are being demolished?
  - Coburg Road buildings being demolished
  - Site does not include Caxton Road
  - The Recycling Depot is staying (as not part of this application)
- 18 storeys is higher than the approved and taller than Wood Green.
  - It is felt the height and density is appropriate for the area
  - There are a range of heights, getting lower to the south
- The location of the tall buildings, and the impact on the local character. What is the justification for the numbers of tall buildings? Will the top floors be publically accessible?
- What are the affordable housing numbers and tenure mix? Will this be set? Will there be an increase in affordable housing to balance the increase in unit numbers?
  - This will be discussed with the local authority
  - Affordable housing will need to be balanced with CIL and S106 requirements
- Noise impacts from the railway on new dwellings, and dwellings in Hornsey Park Road.
- Conflicts between private and semi-private gardens and amenity spaces.
- The depth of car parking basements.
- Car parking numbers verses the number of units, there is a shortfall and no enough spaces.
  - Car parking numbers are set in the London Plan
  - Parking demands need to weighed against sustainability
- How much is the scheme contingent on Crossrail 2?
  - It is not – The Piccadilly Line upgrade will assist viability
  - Site has a high PTAL
- The size of the ‘public square’ has decreased?
  - Other squares and spaces are proposed, and this is not a ‘civic space’

- Is the height reduction and breaking up blocks better than the previous slab block scheme?
- What is the net employment gain?
  - In space, there is a 3-400% increase
  - In jobs, there is an increase of around 700
- The increase in employment space was welcomed.

The Parkside Malvern Resident's Association raised the following issues/questions:

- Suspicious of 1600 units and the resultant density
- What is the justification of the constraints and unit numbers?
- It is at the top end of the AAP unit numbers
- Has there been consultation on the AAP rather than the application?
- The layout is improved, but not the increase in height
- What is the site size? What is the density calculation vs. site area?
- There is a lot of development on the site, with no 'space'
- The heights and therefore unit numbers, are not justified
- The Moselle should be de-culverted
  - CIL can be spent on the Blue Ribbon Network, for future-proofing etc.
- Water quality should not be a barrier to de-culverting
  - Moselle well over safe limits
  - Thames Water plan to clean, but what are the timescales?
- Solutions are available for water quality issues
- The heights on Coburg Road are an issue
- PTAL Is not a justification for height
- Is this a 'vanity project'?
- 12% of Berkeley Homes housing target are proposed in Wood Green
- Cycle/pedestrian separation and safety
- What is the reason for the variation in height? – There are examples of residential developments that are the same height
- There is no pattern to the southern layout
- There is a lack of gardens and issues with the amenity space
- There are conflicts between the private and public amenity spaces

## Appendix 5: GLA Stage 1 Response

GREATER LONDON AUTHORITY

Development, Enterprise and Environment

**James Farrar**  
Haringey Council  
River Park House  
225 High Road  
Wood Green  
London N22 8HQ

Our ref: D&P/0130d/01/MJ  
Your ref: HGY/2017/3117  
Date: 29 January 2018

Dear Mr Farrar

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008  
Land at Haringey Heartlands  
Local planning authority reference: HGY/2017/3117**

I refer to the copy of the above planning application, which was received from you on 8 November 2017. On 29 January 2018, the Mayor considered a report on this proposal, reference D&P/0130d/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers the application does not yet fully comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 86 of the above-mentioned report; but that the possible remedies set out in that paragraph could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Alex Lloyd; Tel: 020 3054 6706; e-mail: alexlloyd@tfl.gov.uk.

City Hall, London, SE1 2AA • london.gov.uk • 020 7983 4000

29 January 2018

**Land at Haringey Heartlands**

in the London Borough of Haringey

planning application no. HGY/2017/3117

<p><b>Strategic planning application stage 1 referral</b></p> <p>Town &amp; Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town &amp; Country Planning (Mayor of London) Order 2008.</p>
<p><b>The proposal</b></p> <p>Hybrid planning application (part outline, part detailed) for the demolition of Olympia Trading Estate and Western Road buildings, and a phased, residential-led mixed-use development in buildings of up to 19 storeys, comprising 163,300 sq.m. of residential space (minimum 1,714 units); 7,168-7,500 sq.m. of business space; 1,500-3,950 sq.m. of retail space; a 417 sq.m. nursery; up to 2,500 sq.m. of leisure space; and new public open space.</p>
<p><b>The applicant</b></p> <p>The applicant is <b>St. William (Berkeley Homes)</b>, the architects <b>LDA Design, Panter Hudspith</b>.</p>
<p><b>Strategic issues</b></p> <p><b>Employment:</b> The proposed commercial/employment workspace is supported; however, a minimum requirement of B1(c) floorspace must be secured.</p> <p><b>Retail and town centre uses:</b> Proposed A5 'hot food and takeaway' uses are contrary to Policy E9 of the draft London Plan and are not supported.</p> <p><b>Affordable housing:</b> 32.5% affordable housing, comprising 48% affordable rent, 52% shared ownership. The applicant's viability assessment has been rigorously assessed by the Council's independent advisers and GLA officers and confirms that the scheme can viably support 8% affordable housing, resulting in a betterment of 24.5% being secured. On the basis of a significant growth based affordable housing offer, the absence of a late stage review is acceptable in this case, subject to securing affordable rent levels and shared ownership affordability, and all required planning obligations. Early stage viability reviews are required for both the detailed and outline elements, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG.</p> <p><b>Urban and inclusive design:</b> The design and residential quality of the proposals is generally high; however, for the outline element, the design code must be strengthened in order to secure residential quality, in accordance with Policies D2, D4 and D6 of the draft London Plan. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.</p> <p><b>Transport:</b> Infrastructure and a contribution of £1,250,000 is required for an extension to an existing bus route. Further information is required on cycle routes and cycle parking. Conditions and informatives are required to ensure Crossrail 2 safeguarding.</p> <p><b>Climate change:</b> Further information is required on overheating, worksheet calculations, the site heat network, combined heat and power, and the potential of on-site renewable technologies.</p>
<p><b>Recommendation</b></p> <p>That Haringey Council be advised that the application does not yet fully comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 86 of this report.</p>

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## Context

1 On 8 November 2017, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan and the draft London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B(c) and 1C(c) of the Schedule to the 2008 Order:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 1B(c) *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
- 1C(c) *"Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London."*

3 Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

6 The 4.75 hectare site currently comprises the former Clarendon Gasworks, which is a cleared site, with two gasholder pits remaining; adjacent areas of cleared land; Mary Neuner Road, running north-south through the site; and low-rise industrial buildings at the north end of the site, comprising the Olympia Trading Estate and 57-59 Western Road. The site excludes the pressure reduction station site and access to it on the eastern side of the site, which is being delivered by National Grid under a separate planning application.

7 The site is bounded by Coburg Road, Silsoe Road and Brook Road to the north; rear gardens of terraced houses fronting onto Hornsey Park Road to the east; light industrial units fronting onto Clarendon Road to the south; and Western Road and an embankment to the railway lines between Hornsey Station and Alexandra Palace Station to the west. Clarendon Road in the south connects to Western Road in the north via Mary Neuner Road, which runs in a north-south direction through the site. Light industrial uses lie to the north, south, and west, with low rise residential uses to the east. Wood Green (Metropolitan) town centre lies immediately adjacent to the north-east.

8 The site is within an area undergoing significant change, with sites both to the north and the south of the site allocated within the Council's Local Plan and the draft Wood Green Area Action Plan (AAP) for redevelopment. To the immediate north, a current planning application for the Chocolate Factory & Parma House site proposes a mixed-use development comprising 9,376 sq.m. of commercial floorspace, and 216 residential units, in buildings from 3 to 16 storeys (GLA Ref: D&P/3260/01; LPA Ref: HGY/2017/3020).

9 The nearest section of the Transport for London Road Network (TLRN) is the A406 North Circular Road, which is approximately 2.8 kilometres to the north of the site. The nearest section of the Strategic Road Network (SRN) is the A105 High Road Wood Green, which is approximately 1 kilometre to the north-east. The nearest London Underground stations are Wood Green and Turnpike Lane, which are both approximately 1 kilometre from the site, served by the Piccadilly Line. The nearest rail stations are Alexandra Palace and Hornsey, which are both approximately 900 metres from the site. The nearest bus stops are on Wightman Road, which are approximately 500 metres to the south of the site, served by bus routes 41, 144, N41 and N91. The public transport accessibility level (PTAL) of the site is between 2 and 4, (on a scale of 1 to 6 where 6 is excellent and 1 is very poor).

### **Details of the proposal**

10 The proposal is in the form of a hybrid planning application, comprised of full and outline elements.

11 Detailed planning permission is sought for the construction of buildings of up to 15 storeys to accommodate 616 residential units; 332 sq.m. of business space (Use Classes A1-A5 and B1); a 417 sq.m. nursery; associated cycle and car parking provision; two basements; energy centre; public realm works and landscaping; vehicular access and new servicing arrangements; associated highway works; and realignment of Mary Neuner Road. The detailed application proposes to increase the height of Building C1 from 9 storeys, as permitted under the existing reserved matters application, to 15 storeys.

12 Outline planning permission is sought for the demolition of Olympia Trading Estate and Western Road buildings and structures, and construction of 103,150 sq.m. of residential use; 7,500 sq.m. of business use (Use Class B1); 1,500-3,950 sq.m. of retail space (Use Class A1-A5); and up to 2,500 sq.m. of leisure use (Use Class D1). The proposals include buildings of up to 19 storeys (103.9 metres AOD); associated cycle and car parking provision; new basement level; energy centre; new public square, public realm works and landscaping; vehicular access and new servicing arrangements; associated highway works; and facilitating works. The existing gasholder pits may be used for D1 leisure use, such as a gym. All matters are reserved, apart from vehicular access into the basement car park from Mary Neuner Road and Western Road.

13 The outline application is subject to parameter plans, a design code, and a development specification. A development proposal is also submitted, which illustrates how the application could be delivered at reserved matters.

### **Case history**

14 National Grid and the London Development Agency obtained outline planning permission (LPA ref: HGY/2009/0503; GLA Ref: PDU/0130/02) in 2012 for *Demolition of existing structures and redevelopment to provide a residential led, mixed-use development, comprising between 950 to 1,080 residential units; with 460-700 sq.m. of office uses (B1); 370-700 sq.m. of retail/financial and professional services uses (A1/A2); 190-550 sq.m. of restaurant/cafe/drinking establishment uses (A3/A4); 325-550 sq.m. of community/assembly/*

*leisure uses (D1/D2); new landscaping, public and private open space, energy centre, two utility compounds, up to 251 car parking spaces, cycle parking, access and other associated infrastructure works.*" This site did not include the land at 57-59 Western Road, for which there is no relevant planning history.

15 The 2012 permission was subsequently amended by a section 73 planning permission (LPA Ref: HGY/2013/2455; GLA Ref: D&P/0130b/02) in 2014, relating to phasing and facilitating the early delivery of site preparation works, including the dismantling of the gas holders and construction of two utility compounds (containing pressure reduction stations) in advance of the submission of reserved matters applications.

16 A further Section 73 application (LPA Ref: HGY/2016/0026; GLA Ref: D&P/0130c/NSI), sought the relocation of the approved pressure reduction station and further adjusted phasing and the timing for the submission of various details, for which planning permission was granted in 2016.

17 Reserved matters applications have subsequently been approved and the permission implemented by the demolition of the gasholders, enabling the following to be developed:

- Up to 1,056 residential units (C3), 24.4% (by habitable room) affordable.
- 700 sq.m. of office uses (B1).
- 700 sq.m. of retail/financial and professional services uses (A1/A2).
- 550 sq.m. of restaurant/cafe/drinking establishment uses (A3/A4).
- 550 sq.m. of community/assembly/leisure uses (D1/D2).
- Up to 251 car parking spaces.
- Buildings up to 10 storeys.
- Erection of the pressure reduction stations.

18 A reserved matters permission also enables the construction of Building C7 (now identified as C1 in this application), of up to 9 storeys, with 104 residential units, and 337 sq.m. of commercial floorspace. This building does not include any affordable units, and was not designated to contain any in the approved parameter plans.

19 On 5 July 2017, a pre-application meeting was held with GLA and Haringey officers for *"redevelopment of former gasholder site to provide approximately 1,610 new residential units and commercial floorspace in buildings of up to 18 storeys"*. On 26 July 2017, a pre-application advice report was issued (GLA Ref: D&P/4186), which concluded that the principle of residential-led mixed use development was strongly supported, although the applicant should ensure that the issues raised with respect to employment uses; affordable housing; housing; urban design; inclusive design; climate change; and transport, were fully addressed prior to the submission of any planning application.

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

20 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Haringey's Strategic Policies DPD (July 2017), Development Management DPD (July 2017), and Site Allocations DPD (July 2017); and the 2016 London Plan (Consolidated with Alterations since 2011).

21 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- Draft London Plan (consultation draft December 2017).

- The Wood Green Area Action Plan (Regulation 18 Preferred Option Consultation Draft, February 2017).
- Opportunity Areas *London Plan*
- Employment *London Plan*
- Retail and town centres *London Plan, Town Centres SPG*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy; the Mayor's draft Transport Strategy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; the Mayor's draft Environment Strategy*

## Principle of development

22 The site falls within the London Plan 'Haringey Heartlands/Wood Green Intensification Area', with an employment capacity of 2,000 and at least 1,000 new homes; and the emerging 'Wood Green/Haringey Heartlands Opportunity Area', for which the draft London Plan identifies an employment capacity of 2,500 and at least 4,500 new homes, with Clarendon Road gasworks identified as a key site.

23 The site is within a Local Employment Area, as identified in Haringey's Strategic Policies DPD (July 2017), which supports employment uses as part of mixed use development, also including residential, retail and community uses. The site is not identified as a Locally Significant Employment Area, and is therefore a 'non-designated industrial site'. The Council's Site Allocations DPD (July 2017) identifies the majority of the site (SA22: Clarendon Square) for 1,080 homes, 700 sq.m. of commercial space, 920 sq.m. of town centre uses, and 550 sq.m. of community/assembly/leisure uses, reflecting the consented scheme. The Western Road part of the site is identified as SA24: NW of Clarendon Square, identified for high density employment-led mixed use, with capacity for 1,005 sq.m. of employment floorspace. The draft Wood Green Area Action Plan (February 2017) identifies the site (WG SA 18, Clarendon Road) for mixed use, including 14,091 sq.m. of commercial space, 7,046 sq.m. of town centre uses, and 1,610 residential units.

### Residential

24 Policy H1 'Increasing Housing Supply' and Table 4.1 of the draft London Plan sets Haringey an annualised average housing completion target of 1,958 units (increased from 1,502 in the current London Plan) per year between 2019/20 and 2028/29. The redevelopment of the site with residential uses as part of a mixed-use development, would contribute to London Plan housing targets and is strongly supported.

## Employment

25 The northern part of the site contains industrial and commercial uses, as detailed below:

	Use Class	sq.m.
<b>Olympia Trading Estate</b>		
Builders Merchant	Sui Generis	1,331
Publisher Services	B1/B8	3,067
Book warehouse	B8	1,451
<b>57-89 Western Road</b>		
Garage	B2	2,266
Various	B1(a)	
<b>Total</b>		<b>8,115</b>

26 The proposals include the following non-residential:

	Use Class	sq.m.
<b>Detailed</b>		
Commercial	A/B1	332
Nursery	D1	417
<b>Outline</b>		
Commercial	B1(a)/(b)/(c)	7,168-7,500
Retail	A1-A5	1,500-3,950 (A1 max 2,500)
Assembly & leisure	D2	Up to 2,500
<b>Total</b>		<b>9,417-14,699</b>

27 The consented scheme proposed 2,500 sq.m. of non-residential uses, made up of 700 sq.m. of office uses (B1); 700 sq.m. of retail/financial and professional services uses (A1/A2); 550 sq.m. of restaurant/cafe/drinking establishment uses (A3/A4); and 550 sq.m. of community/assembly/leisure uses (D1/D2). This consent did not include Western Road within the site.

28 London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. The draft London Plan identifies a significant loss of industrial land to other uses between 2001 and 2015, well in excess of monitoring benchmarks in the current London Plan, and a positive net demand for industrial land is expected in the 2016-2041 period. Policy E4 'Land for industry, logistics and services to support London's economic function' of the draft London Plan identifies that sufficient land and premises need to be retained for industrial and related functions, and Table 6.2 identifies that Haringey needs to retain capacity. Policy E7 'Intensification, co-location, and substitution...' of the draft London Plan supports mixed use developments on non-designated industrial sites where there is no prospect of the site being used for industrial purposes; it has

been allocated for mixed use in a development plan; industrial, storage or distribution space is re-provided; or where suitable alternative accommodation is available, and subject to relocation support.

29 Policy E1 'Offices' of the draft London Plan, and London Plan Policy 4.2 supports new office space of different sizes. Policy E2 'Low-cost business space' of the draft London Plan supports the provision of low-cost B1 business space to meet the needs of micro, small and medium-sized enterprises, particularly where proposals include new B1 business space greater than 2,500 sq.m., as proposed here.

30 All of the 8,115 sq.m. of industrial-type floorspace currently existing on the site would be demolished, replaced by a reduced quantum of 7,168-7,500 sq.m. of B1 floorspace, including B1(c) light industrial use. The applicant states that a range of Class B1 (a), (b) and (c) is expected to be delivered, with clusters of creative/maker floorspace; intermediate floorspace; and high-specification office floorspace. The Council's Site Allocations DPD (July 2017) identifies the site for 1,705 sq.m. of commercial/employment floorspace, with 920 sq.m. of town centre uses, and 550 sq.m. of community/assembly/leisure uses; while the draft Wood Green Area Action Plan (February 2017) identifies the site for a much greater level of 14,091 sq.m. of commercial space and 7,046 sq.m. of town centre uses. The applicant states that it would be difficult to deliver this quantum of floorspace while delivering the site allocation required number of homes, with the proposed level of affordable housing, while limiting height to respect views of Alexandra Palace. Noting the recently adopted policy designation for this site, and the increased provision of commercial/employment floorspace now proposed compared to both the consented scheme and the Site Allocations DPD, the overall quantum of employment space is acceptable. However, whilst it is acknowledged for the purposes of Policy E7 of the draft London Plan that the site has both an extant consent and an up to date allocation for a mix of uses, to ensure that the development provides an appropriate balance of employment that responds to strategic requirements relating to industrial capacity, the complete loss of industrial use on this site would not be supported. Therefore, as stated at pre-application stage, a minimum re-provision of B1(c) is required

31 Policy E7 also requires that the application demonstrates that the operations of industrial uses on the site and surrounding sites are not compromised by residential uses. Design mitigation is required in the residential accommodation in terms of safety and security; layout, orientation, access, servicing and delivery; design quality, public realm and visual impact and amenity for residents; vibration and noise; and air quality. The applicant should provide further details on proposed mitigation, particularly in relation to industrial uses to the north of the site, which will need to be secured appropriately.

32 The outline permission should be subject to a condition to require the applicant to work with a specialist workspace provider to ensure that the space is designed flexibly and to limit costs to potential occupiers, in line with Policy E2 of the draft London Plan.

33 The applicant has provided details of the relocation strategy for the existing business tenants, which includes relocation to Enfield with GLA support, and relocation within the proposed scheme. The Council is also contractually required to use all reasonable endeavours to assist existing occupiers of the Western Road buildings to relocate.

#### Retail and town centre uses

34 London Plan Policies 2.15 'Town Centres', 4.7 'Retail and town centres', and 4.8 'Supporting a successful and diverse retail sector'; and draft London Plan Policies SD6, SD7, SD8 and SD9 provide the strategic policy context in which the proposals are considered, and identify

a town centres first approach. The site lies on the border of Wood Green town centre, identified as a Metropolitan town centre in the London Plan and draft London Plan, and can therefore be considered as an 'edge of centre' site.

35 The level of town centre floorspace proposed is above that identified in the Site Allocations DPD (920 sq.m.), although less than the draft Wood Green AAP (7,046 sq.m.). Nearly all of these uses are located in the outline part of the application site, adjacent to the town centre, and focussed around the proposed new public square. This provision will activate the ground floor and the overall quantum of floorspace does not raise strategic concern. Of the 1,500-3,950 sq.m. of A Class uses proposed in the outline application, Use Class A1 shops are limited to 2,500 sq.m., which is also supported. Use Classes A3 and A4 'food and drink' are proposed, which also contributes to draft London Plan Policy HC6 'Supporting the night-time economy' and is supported. However, given the site's location within 400 metres of a primary school, the provision of Use Class A5 is contrary to Policy E9 'Retail, markets and hot food takeaways' of the draft London Plan and any permission must exclude this use.

## Housing

36 The application proposes a minimum of 1,714 units, as set out below:

<b>Detailed</b>	Market	Intermediate (shared o'ship)	Affordable rent	Total
Studio	68	0	0	68
One-bed	163	9	21	193
Two-bed	224	22	34	280
Three-bed	22	0	45	67
Four-bed	1	0	7	8
<b>Total</b>	<b>478</b>	<b>31</b>	<b>107</b>	<b>616</b>
		<b>30.6% (hab room)</b>		

<b>Outline</b>	Market	Intermediate (shared o'ship)	Affordable rent	Total
Studio	105	0	0	105
One-bed	268	78	1	347
Two-bed	402	159	25	586
Three-bed	17	0	24	41
Four-bed	0	0	19	19
<b>Total</b>	<b>792</b>	<b>237</b>	<b>69</b>	<b>1,098</b>
		<b>33.6% (hab room)</b>		

<b>Site wide</b>	<b>Market</b>	<b>Intermediate (shared ownership)</b>	<b>Affordable rent</b>	<b>Total</b>
Studio	173	0	0	173
One-bed	431	87	22	540
Two-bed	626	181	59	866
Three-bed	39	0	69	108
Four-bed	1	0	26	27
<b>Total</b>	<b>1,270</b>	<b>268</b>	<b>176</b>	<b>1,714</b>
		<b>32.5% (hab room)</b>		

### Affordable housing

37 Policy H5 'Delivering affordable housing' of the draft London Plan and the Mayor's Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 'Threshold approach to applications' identifies a minimum threshold of 35% (by habitable room) (or 50% on former industrial sites) affordable housing, whereby applications providing that level of affordable housing, with an appropriate tenure split, without public subsidy, and meeting other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor, can follow the 'Fast Track Route' set out in the SPG; this means that they are not required to submit a viability assessment or be subject to a late stage viability review. Policy H7 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG sets out a preferred tenure split of at least 30% low cost rent, with London Affordable Rent as the default level of rent, at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined in partnership with the local planning authority and the GLA.

38 The site wide application proposes 32.5% affordable housing without public subsidy, made up of 48% affordable rent, 52% shared ownership. Within this, the detailed application proposes 30.6% (by habitable room) affordable housing, made up of 87% affordable rent and 13% shared ownership; and the outline application proposes 33.6% affordable housing, with a lesser proportion of affordable rent and a greater proportion of shared ownership, in order to achieve the tenure mix across the whole site.

39 The affordability of the low cost rented units has been agreed with the applicant and the Council, and accords with the requirements of Policy H7 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report:

- up to 80% of the local market rent or local housing allowance levels, for one-beds (whichever is lower);
- up to 65% of the local market rent or local housing allowance levels, for two-beds (whichever is lower), and
- social/target rent for three-beds.

40 The affordability of the intermediate units should be informed by the Mayor's qualifying income levels, as set out in the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report.

41 As the proposal does not meet the requirements of the threshold approach, the applicant has provided a viability assessment, which has been rigorously assessed by the Council's independent advisers and GLA officers and confirms that the scheme can viably support 8%

affordable housing. The offer of 32.5% put forward by the applicant therefore represents a significant betterment of 24.5%; however, this is on the basis that no late stage viability review would be required. The principle of a late stage review, in order to capture potential future growth in sales values, is a strategic priority that underpins the Mayor's approach to viability and the delivery of an increased level of affordable housing. As such, the absence of a late stage review must be appropriately mitigated by an affordable offer significantly above that supported by viability, and is only acceptable by exception. On this basis, the growth-based affordable housing contribution of 32.5% is significantly above the 8% provision that has been independently verified as the maximum amount, and has effectively secured and front-loaded potential growth. This approach ensures that a larger proportion of on-site affordable housing would be delivered by the scheme from the outset.

42 The requirement for an early stage viability review will be triggered if an agreed level of progress on implementation is not made on the detailed application site within two years of the permission being granted, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. Early stage viability reviews will also be required relating to the timing of the submission and implementation of reserved matters applications on the outline application site.

43 In conclusion, given the acceptance of significant growth assumptions at the decision-making stage, in order to front-load substantial additional affordable housing delivery, the absence of a late stage review is acceptable in this case; subject to securing affordable rent levels and shared ownership affordability, and all required planning obligations.

44 The Council must publish the financial viability assessment in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information in accordance with the SPG.

#### Housing choice

45 Policy H12 'Housing size mix' of the draft London Plan states that boroughs should not set prescriptive dwelling size mix requirements for market and intermediate homes; and for low cost rent, boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs.

46 The proposal includes a good range of one to four-bed units, with almost 50% of the affordable rent units as family-sized in the detailed application; and the majority in the indicative breakdown for the outline application. The proposed choice of units is supported.

#### Children's play space

47 Policy S4 'Play and informal recreation' of the draft London Plan and London Plan Policy 3.6 seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child, with further detail in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation'.

48 The applicant's indicative masterplan, reflecting the detailed application proposals and the illustrative outline proposals identifies a requirement for 3,570 sq.m. of play space, with 1,690 sq.m. for under-fives. A total of 2,000 sq.m. of play space is proposed in residents' communal courtyards and rooftop spaces for under-fives, and 860 sq.m. for older age groups in the proposed community park, with the balance of 710 sq.m. provided off-site. For the detailed application

proposals alone, the proposals include 990 sq.m. of play space for under-fives (810 sq.m. required), and 570 sq.m. for older children (1,060 sq.m. required), with the balance of 490 sq.m. provided off-site. Details of the design of play space has also been provided. The application demonstrates that significant play facilities are easily accessible within 800 metres of the site. The proposed play facilities are supported, subject to confirmation of any financial contribution requirements towards off-site provision.

## Urban design

### Density

49 London Plan Policy 3.4 and draft London Plan Policy D6 'Optimising housing density' seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the development design, as described in draft London Plan policies D4 'Housing quality and standards' and D2 'Delivering good design'.

50 The proposal has a density of approximately 401 units per hectare, which discounts land occupied by Mary Neuner Road and accounts for the impact of non-residential uses. This exceeds the top of the guidance ranges in Table 3.3 of the London Plan (based on the site's PTAL of 2-4), and the thresholds for increased scrutiny of design quality set out in the draft London Plan.

51 Subject to resolution of the issues raised below, the proposal would deliver good design and residential standards. While of a greater scale than the existing context, the proposals reflect the Council and GLA aspirations for the development of the local area. Subject to appropriate contributions to local bus services as discussed under 'transport' below, the proposals are appropriate considering local transport facilities. Subject to these points, and agreement of the affordable housing offer and appropriate employment uses, the density proposed is therefore acceptable, in line with London Plan Policies D2, D4 and D6. In line with Policy D6, the applicant must submit a management plan detailing day-to-day servicing and delivery arrangements and long-term maintenance implications, as detailed in paragraph 3.6.8 of the draft London Plan. The agreed maintenance plan should be secured by condition as part of any permission.

### Site layout

52 The general layout of the proposals is well considered and would help to establish a permeable and legible public realm network, with a good network of streets and public open spaces. The proposals retain a realigned Mary Neuner Road as the main north/south route through the site; introduce a new community park and connecting Moselle Walk, which forms a new east/west route through the site linking to Hornsey Park Road; and a new public square towards the north of the site. The proposals will deliver significant areas of new public open space, as follows, which are strongly supported on a site of this size:

	Detailed (sq.m.)	Outline (sq.m.)
Public residential courtyards	1,208	1,050
Public square	0	1,032
Community Park and Moselle Walk	3,462	1,486
Other public realm	3,257	4,278
<b>Total</b>	<b>7,927</b>	<b>7,846</b>

53 The strategy for the detailed application is to raise the residential buildings above the level of Mary Neuner Road by 0.75 metres on the east side of the road and 1.5 metres to the west. It is understood that this was as a result of Haringey's Quality Review Panel concern to ensure greater privacy to ground level units; while it also allows undercroft parking below. It is also recognised that setting the undercroft parking at a lower level would require greater excavation and increased associated decontamination costs. Entrances to cores are via five public courtyards with graded routes to entrances, although secondary street entrances are also provided to some ground floor maisonettes, which is welcomed. Although this arrangement does not fully realise the benefits of active streets and passive surveillance; together with the landscaped residents' courtyards and the new community park, this does result in a distinctive and attractive streetscape, as well as a significant piece of new green infrastructure, which is supported.

54 Access to residents' cycle storage to the rear of the proposed blocks in the detailed application are also 1.5 metres below the proposed adjacent blocks on the west side of Mary Neuner Road, to ensure privacy; and 0.75 metres below the proposed adjacent blocks on the east side, which also maintains privacy to the existing residential gardens to the east. GLA officers raised safety concerns about this arrangement at pre-application stage, and as a result of discussions with the Council's Secure by Design officer, the proposals ensure that access to these routes is secured and the routes well-lit, with cycles stored in secured cages. Fittings will also be specified to allow CCTV cameras. This arrangement is accepted.

55 Similarly, Moselle Walk, proposed under the outline application, is 1.5 metres below the proposed adjacent blocks in order to provide privacy to residential units. The landscape masterplan shows level access to the route from connecting public realm; however, stepped access is shown to adjacent residential courtyards. It is accepted that these courtyards do not have space for ramped access, and level access is provided to the blocks from streets to the west and the north. The arrangement is therefore accepted.

56 The proposals generally respond well to the existing context, providing sufficient distance between neighbouring buildings, and stepping down in massing. The southern-most blocks in the detailed application are positioned in close proximity to the southern boundary; however, the sites to the south are designated as development site within the Wood Green AAP and the primary outlook from residential units has therefore been directed to the east and west in order to ensure privacy.

#### Residential quality

57 Policy D4 of the draft London Plan sets out housing quality, space, and amenity standards, and as discussed above, residential quality is particularly critical for high density proposals such as this.

58 Most of the proposed blocks are L-shaped, which allows more than 60% of the units to be dual aspect across the masterplan area, compared to 23% of the extant scheme. Although 9% of the units in the detailed application are single aspect north-facing, which the Mayor's Housing SPG states should normally be avoided, these units are located adjacent to residential courtyards or open spaces with a good outlook; exceed London Plan minimum space standards; achieve good levels of daylight penetration according to BRE standards, as they are not overly deep; and none are family-sized. Some single aspect units face west towards the railway embankment; however, the section drawings demonstrate that the gentle slope of the embankment allows sufficient outlook and daylight penetration.

59 Two of the blocks in the detailed application site have 11 units per core on some floors, which goes beyond the Mayor's Housing SPG standard of 8 units per core; although this has been reduced in response to pre-application comments, and natural lighting and ventilation has been introduced to the corridors on these floors, which are also of a generous width. The detailed application adds two storeys with 14 units per core to Block C1; however, it is accepted that planning permission already exists for a 9 storey building with this layout, and the corridors are split either side of the core.

60 For the outline element, the design code must be strengthened in order to secure a good residential quality, to state that units must be designed in accordance with the Mayor's Housing SPG (or any updated guidance from the Mayor), unless there are exceptional reasons not to, which must be agreed with the Council.

61 In accordance with Policy D11 'Fire safety' of the draft London Plan, the Council should secure an Informative requiring the submission of a fire statement, produced by a third party suitable qualified assessor.

#### Height and massing

62 The proposals include buildings of up to 15 storeys in the detailed application to the south of the site; and the parameter plans for the outline application allow buildings stepping up to 19 storeys to the north. This represents a significant step change compared to both the existing massing, and the extant scheme of up to 10 storeys; however, the Wood Green area, and this site in particular, is identified as suitable for tall buildings (defined by the Council as 10 storeys and above) in the Council's Local Plan and the draft Wood Green AAP.

63 The tallest proposed buildings are adjacent to development sites to the north, which are expected to come forward with buildings of a similar height, including a current application with buildings of up to 16 storeys. Taller buildings are also located along the railway embankment on the western side of the site, stepping down to the existing low-rise terraced housing to the east. The massing of the blocks is generally of a mansion block typology, with taller landmark buildings to the north reducing in massing with step-backs, reducing visual impact. The proposed height and massing is supported.

#### Appearance

64 The predominate material within the masterplan will be brick of varying tones, chosen in response to the surrounding context and palette of materials within Wood Green, with metalwork detailing. A series of brick detailing and facade themes, both for the detailed application site, and secured in the design code for the outline application, ensure variation and depth to the facades, creating a high quality and distinctive appearance. A double storey base is proposed along key street frontages reflecting maisonettes and non-residential functions. These principles are secured within the design code for the outline element, which also ensures some variation through the use of specific codes for 6 identified zones. The resulting appearance of the proposals is of a high quality and is supported.

#### **Historic environment and strategic views**

65 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*" and in relation to conservation areas, special attention must be paid to "*the desirability of preserving or*

*enhancing the character or appearance of that area*". Policy HC1 'Heritage conservation and growth' of the draft London Plan, like London Plan Policy 7.8, states that development should conserve heritage assets and avoid harm. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation; significance can be harm or loss through alteration or destruction of the heritage asset or development within its setting.

66 Policy HC4 'London View Management Framework' of the draft London Plan, like London Plan Policy 7.12, states that development should not harm strategic views, with further detail provided in the Mayor's supplementary planning guidance 'London View Management Framework' (LVMF SPG).

67 Conservation areas in the vicinity of the site include Haringey Waterworks, 200 metres to the west of the site on the other side of the railway embankment; Wood Green Common, 250 metres to the north; Alexandra Palace and Park (both also Grade II listed), 350 metres to the west; Noel Park, 400 metres to the east; and Hornsey High Street, 400 metres to the south. Any listed buildings are more than 400 metres from the site, the closest being the Grade II\* Top Rank Club to the north-east.

68 An assessment of the impact on heritage assets is contained within the applicant's Townscape, Heritage, and Visual Impact Assessment (THVIA), which also includes an analysis of the impact of the detailed proposals, and the maximum and minimum parameter design on 27 views, including LVMF SPG Assessment Points 1A.1 and 1A.2 for the London Panorama from Alexandra Palace. The THVIA identifies negligible; minor; and moderate, beneficial impact on the conservation areas. No impact or negligible impact is identified on listed buildings. Minor to moderate beneficial impacts are identified on LVMF viewpoints. Concerning the LVMF assessment, the proposals are outside of the defined panorama, although they would be visible on the far left from the viewpoints.

69 GLA officers agree with these findings and confirm that no harm will be caused to heritage assets or strategic views. In coming to these conclusions, GLA officers have taken account of the strong presumption against granting permission that would harm the character or appearance of conservation areas, and have placed considerable importance and weight to the protection of the setting listed buildings from harm.

### **Inclusive design**

70 Policy D3 'Inclusive design' of the draft London Plan and London Plan Policy 7.2 seek to ensure that proposals achieve the highest standards of accessible and inclusive design (not just the minimum). As discussed above, the rationale for raising the level of the residential buildings above the level of Mary Neuner Road is understood, and the graded routes to entrances are of an appropriate gradient.

71 Policy D5 'Accessible housing', and Policy 3.8 of the London Plan, requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The application materials state that the proposals will meet these requirements; however further information should be provided to identify where the wheelchair accessible homes are located and how many there are. These should be distributed across tenure types and unit sizes to give disabled and older people similar choices to non-disabled. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

## Transport

72 The draft London Plan states that development proposals should ensure that the bus network can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed (Policy T3). In the interest of sustainable transport, including the reduction of car dependency, and in support of future residents' connectivity to jobs, schools, services and leisure activities, a London development of this scale should be integrated into the public transport network. Under existing bus network conditions, some of the proposed homes would be over 400 metres from the nearest bus service, making it relatively poorly integrated into the bus network.

73 The need for bus network integration for this site was recognised under the previous consent, which secured £660,000 through the section 106 agreement to fund bus route extension(s) and/or increased bus service frequency, and £340,000 for bus stop improvements. The greater scale of the current proposals brings a greater need to ensure the development is connected to the bus network. Consequently, an existing bus route should be extended to start/finish within or adjacent to the site. The applicant should provide the infrastructure required for the route extension, either within or adjacent to the site, in the form of a bus turning point; a bus stand and nearby toilet facilities for the driver; and a minimum of 4 bus stops. Bus infrastructure within the site boundary should be shown on plan and delivered as part of the development; bus infrastructure beyond the site boundary should be funded through the section 106 agreement. In addition, the applicant should provide £1,250,000 for the operation of the extended bus route for a period of 5 years, which should be secured through the section 106 agreement.

74 A total of 425 car parking spaces are to be provided for the residential element of the development, including 170 Blue Badge spaces, which equates to 0.25 spaces per unit. This is consistent with the maximum standard for an outer London Opportunity Area, and provides a Blue Badge space for 10% of residential units, as per Policy T6.1 of the draft London Plan and Policy 6.13 of the London Plan. In addition, three visitor spaces, a further three Blue Badge spaces, and three car club spaces will be provided on-street, which is supported. A total of 20% of the car parking spaces should have charging facilities for electric vehicles, with passive provision for all remaining spaces. The non-residential land uses will be car free, which is supported; however, at least one Blue Badge parking space should be provided for each of these land uses.

75 In line with the Mayor's Healthy Streets approach, the Council should use the walking and cycling environment assessment to prioritise improvements to the local walking and cycling environment, and secure contributions for works through the section 106 agreement. In order to demonstrate how the proposals will contribute positively to an integrated cycling network, as per current London Plan Policy 6.9 and draft London Plan policy T2(C), the applicant should provide a plan showing cycling routes within the site; connections between internal and external cycle routes; and all cycle access points within the site.

76 The applicant must meet the minimum cycle parking standards of the London Plan and the draft London Plan. A total of 3,065 cycle parking spaces (2,863 long-stay plus 202 short-stay) are proposed; however, the applicant must set out its cycle parking quantity provision by land use against minimum standards. To demonstrate that cycle parking is secure, integrated, convenient and accessible, further plans are required showing the cycle parking facilities and demonstrating their accessibility.

77 Wood Green has been identified as a possible location for a new Crossrail 2 station, with an alternative option for Crossrail 2 stations at Alexandra Palace and Turnpike Lane stations.

Should planning permission be granted, necessary conditions and informatives are required to ensure safeguarding.

78 A draft construction traffic management plan has been submitted; however further information is required on peak movements by construction phase, to enable assessment of the impact on the road network. A detailed construction logistics plan should be secured by pre-commencement condition and a full delivery and servicing plan by condition.

## **Climate change**

### Energy

79 Based on the energy assessment submitted, compared to a 2013 Building Regulations compliant development, an on-site reduction equivalent to an overall saving of 37% of CO<sub>2</sub> per year in regulated emissions is expected for the domestic element; and 32% for the non-domestic element. Further information has been requested on overheating, worksheet calculations, the site heat network, combined heat and power, and the potential of on-site renewable technologies, which must be provided before the proposals can be considered acceptable in accordance with Policy 5.2 of the London Plan and Policy SI2 of the draft London Plan, and the carbon dioxide savings verified. Full details have been provided to the applicant and the Council.

### Climate change adaptation

80 A Flood Risk Assessment (FRA) has been provided, which confirms that the site is within Flood Zone 1 and has some localised areas of high and medium surface water flood risk. The application includes a comprehensive approach to sustainable drainage, combined with amending the local topography to direct rainwater along exceedance routes to raingardens and swales. This approach should mitigate the relatively small areas of surface water flood risk and the proposals are acceptable in terms of London Plan Policy 5.12 and draft London Plan SI12 'Flood risk management'.

81 A Drainage Strategy has been provided, which states that the site will manage rainwater to a limit of the 1 in 2 year greenfield run-off rate through the use of green roofs with attenuation crates below. This will be supplemented by raingardens and swales across the site and flow paths for exceedance flows have been identified to direct rainwater to these raingardens/swales. This approach represents good practice and complies with London Plan Policy 5.13 and draft London Plan Policy SI13 'Sustainable drainage'.

82 London Plan Policy 7.28 'Restoration of the Blue Ribbon Network' and draft London Plan SI17 'Protecting London's waterways' supports opening up culverted rivers. The Moselle Brook runs in a culvert through the middle of the site. The FRA demonstrates that the invert of the culvert structure is 3 metres below ground level, which would make opening the river challenging to design, and would involve a substantial land take. Furthermore, the water quality within the Moselle Brook is likely to be problematic and would have a negative impact on any surrounding public realm. Therefore, it is accepted that it is impractical to open the culvert in this case.

## **Local planning authority's position**

83 Council officers have engaged in pre-application discussions with the applicant; and it is understood that they are generally supportive. The application is expected to be considered at Committee in February 2018.

## Legal considerations

84 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

85 There are no financial considerations at this stage.

## Conclusion

86 London Plan and draft London Plan policies on employment; retail and town centre uses; affordable housing; housing; urban design; historic environment and strategic views; inclusive design; transport; and climate change are relevant to this application. The application does not yet fully comply with the London Plan and the draft London Plan, for the reasons set out below.

- **Employment:** The proposed commercial/employment workspace is supported; however, a minimum requirement of B1(c) floorspace must be secured.
- **Retail and town centre uses:** Proposed A5 'hot food and takeaway' uses are contrary to Policy E9 of the draft London Plan and are not supported.
- **Affordable housing:** 32.5% affordable housing, comprising 48% affordable rent, 52% shared ownership. The applicant's viability assessment has been rigorously assessed by the Council's independent advisers and GLA officers and confirms that the scheme can viably support 8% affordable housing, resulting in a betterment of 24.5% being secured. On the basis of a significant growth based affordable housing offer, the absence of a late stage review is acceptable in this case, subject to securing affordable rent levels and shared ownership affordability, and all required planning obligations. Early stage viability reviews are required for both the detailed and outline elements, in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG.
- **Urban and inclusive design:** The design and residential quality of the proposals is generally high; however, for the outline element, the design code must be strengthened in order to secure residential quality, in accordance with Policies D2, D4 and D6 of the draft London Plan. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.
- **Transport:** Infrastructure and a contribution of £1,250,000 is required for an extension to an existing bus route. Further information is required on cycle routes and cycle parking. Conditions and informatives are required to ensure Crossrail 2 safeguarding.
- **Climate change:** Further information is required on overheating, worksheet calculations, the site heat network, combined heat and power, and the potential of on-site renewable technologies

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for further information, contact GLA Planning Unit (Development & Projects Team):  
**Juliemma McLoughlin, Assistant Director - Planning**  
020 7983 4271 email juliemma.mcloughlin@london.gov.uk  
**Sarah Considine, Strategic Planning Manager – Development Decisions**  
020 7983 5751 email sarah.considine@london.gov.uk  
**Martin Jones, Senior Strategic Planner, Case Officer**  
020 7983 6567 email martin.jones@london.gov.uk

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