ADDENDUM REPORT FOR ITEM 8

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 8

Reference No: HGY/2017/3117 Ward: Noel Park

Address: Land at Haringey Heartlands, between Hornsey Park Road, Mayes Road, Coburg Road, Western Road and the Kings Cross / East Coast Mainline, Clarendon Gas Works, Olympia Trading Estate, and 57-89 Western Road, London N8 & N22

Proposal: 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 comprising the construction of buildings across the site to include the following 163,300sqm GEA Use Class C3 Residential; 7,500sqm GEA Class B1 Business; 1,500sqm to 3,950sqm GEA Class A1-A4; 417sqm GEA Class D1 Day Nursery; and up to 2,500sqm GEA Class D1/D2 Leisure; New Basement Level; Two Energy Centres; Vehicular Access, Parking; Realignment of Mary Neuner Road; Open space; Associated Infrastructure and Interim Works; Site Preparation Works.

Outline Permission is sought for 103,150sqm Class C3 Residential; 7,168sqm to 7,500sqm Class B1 Business Use; 1,500sqm to 3,950sqm Class A1-A4; and up to 2,500sqm Class D1/D2 Leisure Use; Buildings up to 103.90m AOD; associated cycle and car parking provision; new basement level; two energy centres; new public square, public realm works and landscaping; vehicular access and new servicing arrangements; associated highway works; and facilitating works. Appearance, Landscaping, Layout, Scale and Access are Reserved Matters. Vehicular access into the Basement Car Park from Mary Neuner Road and Western Road are submitted in detail.

Detailed Permission is sought for the construction of Building A1-A4, B1-B4 and C1; ranging from 2 to 15 storeys to accommodate 616 residential units; 332sqm Class B1 Business Use/Class A1-A4 Use; 417sqm Day Nursery; associated cycle and car parking provision; two basements; public realm works and landscaping; vehicular access and new servicing arrangements; associated highway works; Realignment of Mary Neuner Road.

Applicant: St William Homes LLP

Ownership: Private

The following matters are points of clarification or correction and also respond to representations received following publication of the committee report.

Affordable housing

The application proposes 45.6% of the uplift in habitable rooms above the original 24.4% (from the extant permission) as affordable housing, not 35% (6.6.4). The uplift is from 205 affordable (extant permission) to 444 affordable homes, more than double.

The time limited marketing of the scheme for a period of two months relates to the shared ownership homes (page 141, s.106 Head of Terms (1)(III) bullet point 2).

The "Pre-Implementation Review" for the detailed component is after 18 months rather than 2 years.

The 32.5% by habitable room affordable proposal is greater than the maximum reasonable viable amount (page 137, section 1.2 bullet point 6) of 8% affordable (24.5% betterment) when benchmarked against the extant permission.

CIL

CIL payment estimated at £32.5M (£25.5M LBH CIL and £7.0M mayoral CIL with affordable housing relief). The extant permission was approved before CIL was introduced. (page 146) and contributed £8M s.106 by comparison.

Heads of Terms

In recent discussions between the applicant, LBH and Transport for London regarding transport contributions the applicant has agreed to provide a bus driver facility in one of the following blocks (H2, H3 or D4). The following head is added:

- Provisions for a public transport driver facility in blocks H2, H3 or D4.
- Workplace Travel Plan, b: change "residential induction packs" to "employee induction packs"
- Workplace Travel Plan, d: is corrected, as above, to refer to vehicles for all users.

The bus contribution has been amended to £900,000 and the walking and cycling contribution has been decreased to £255,000. This is to reflect the long build out of the site and the need to subsidise the bus service for 5 years.

Loss of Business

The application site (4.8ha) includes land owned by Haringey Council (0.28ha). Businesses on this land will be relocated by Haringey Council prior to this last phase of development as part of the s.106 legal agreement (page 146, s.106 Head of Terms).

Impact on adjacent sites

An additional bullet point to condition 4 is proposed to be included on the decision notice to address the concerns of La Salle in relation to the Bittern Place site:

"Reserved matters applications for any development within development zones H, D and E must be accompanied by a report and/or masterplan demonstrating that the proposed development does not compromise the deliverability of development of adjoining sites"

Heritage

As the Council will have taken Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 into account, it would be prudent to confirm this in the report as follows.

Legal Position and policy relating to Heritage Assets

The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case indicates that "Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise." The Forge Field Society v Sevenoaks District Council case indicates that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving the settings of listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit.

When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area, it must give that harm considerable importance and weight. This does not mean that an authority's assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.

The presumption is a statutory one, but it is not irrefutable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit to each element needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given 'considerable importance and weight' in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

Policy 7.8 of the London Plan requires that development affecting heritage assets and their settings to conserve their significance by being sympathetic to their form, scale and architectural detail. Policy SP12 requires the conservation of the historic significance of Haringey's heritage assets. Policy DM9 of the Councils Development Management DPD pre-submission version 2016 continues this approach.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory obligation on Local Planning Authorities, as decision maker, to have special regard to the desirability of preserving a listed building and its setting, or any features of special architectural or historic interest which it possesses.

The National Planning Policy Framework (NPPF) states that great weight should be given to the conservation of designated heritage assets, and that any harm to their significance requires a clear and convincing justification (paragraph 132). Paragraph 132 of the NPPF clarifies the more important the asset, the greater the weight given to the assets conservation should be. It also makes clear that significance can be harmed through development within the setting of a heritage asset. Paragraph 134 of the NPPF states that where a proposed development would lead to harm to the significance of a designated heritage, this harm should be weighed against public benefits of the proposal.

To confirm the proposal causes less than substantial harm to heritage assets and this harm is outweighed by positive townscape benefits.

PTAL

The site benefits from a PTAL of 4-6 with existing public transport accessibly and improvements to the Piccadilly Line (3.3.6 and 6.2.5).

Plan numbers – the following plans are superseded by revisions.

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439/P/SQ/203 439/P/SQ/203 (Rev A);

439/P/SQ/204 439/P/SQ/204 (Rev A);

439/P/SQ/207 439/P/SQ/207 (Rev A);

439/C1/100-439/P/C1/100 (Rev A);
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Corrections

Class A5 uses have been removed from the proposed development.

The site benefits from a PTAL of 4-6 with existing public transport accessibly and improvements to the Piccadilly Line (3.3.6 and 6.2.5).

3.3.1 – National Grid, St William and Haringey Council part own the site, not the Greater London Authority.

Paragraph 3.1.3 Third sentence is corrected to say A1-A4 not A1-A5 as no A5 is now proposed as part of revisions to the application.

Paragraph – 3rd sentence should say 1719 homes not 1291.

- 6.2.25 the height of the development rises to 15 floors at Block C7. In the northern quarter on the south side of the square, buildings up to 19 storeys are proposed along the northern edge, with flexibility, if a 4 storey office building is proposed, that height could increase to 23 storeys.
- 6.2.7 (page 175) Policy DM6 Building Heights allocates the site as suitable for tall buildings. This is now an adopted policy not emerging.
- 6.4.2 Local Plan allocation SA22 Clarendon Square is excluded from the Local Employment Area allocation. SA24 North West of Clarendon Square isn't excluded.
- 6.4.2 (page 182) the proposed 630 jobs from Class B1 uses, are in addition to an estimated 215 jobs from Class A uses and 45 jobs from Class D uses totalling 890 jobs.
- 6.5.5 there is no requirement to assess daylight and sunlight impact on commercial uses under BRE Guidance. However, the northern quarter is submitted in outline only and can therefore respond at reserved matters stage. New adjacent proposals can also respond to this scheme.
- 6.5.12 the National Grid consent has been implemented and therefore could be completed.
- 6.5.2 there will be 171 wheelchair units with the proposal.
- 6.5.6 with 1714 homes, the required amenity space will be 9733m², marginally greater than 9,647m² but still well below the 34,293m² proposed.
- 6.10.17: the applicant is not proposing to provide off-street parking for the non-residential land uses, although some on-street, short stay car parking will be provided on Mary Neuner Road as part of the proposed realignment scheme. It is to be noted that the London Plan requires the commercial element of the development to be provided with at least one accessible car parking bay designated for Blue Badge Holders, even if general parking is not provided.
- Paragraph 6.4.2 the second sentence is corrected to refer to SA24 (not SA22) which is within a Local Employment Area (Wood Green Regeneration Area).
- 6.4.7 A5 is removed from the sentence. No A5 is included in the proposal.
- 6.10.11- the table under this paragraph relates to underground trips only and is therefore removed from this section.

Clarifications

Paragraph 6.2.5 – the PTAL rating is 4-6 without the Piccadilly Line improvements and is not therefore reliant on it.

Paragraph 6.4.4 – add 'office' after employment to clarify nature of space.

Planning Conditions

A number of corrections and amendments are proposed to the following planning conditions, to reflect the most recent changes to the scheme and, where required, remove duplication as follows:

- B2 the words 'for each phase of development' and 'each phase' is added to reflect the multi-phase nature of the development.
- B3 Timings (Outline) the timings are amended to reflect the indicative phasing shown in the Environmental Statement and also the timings for preimplementation review mechanisms.
- B4 Reserved matters specification. Reference to a single application is deleted as a strategy for submission of reserved matters is already included in B4. Requirement 5 under landscaping is deleted as this duplicates the soft landscaping and play space condition. A requirement is added to submit an updated commercial strategy.
- New condition 11 Noise (Internal Standards) is added to secure recommendations within the Environmental Statement.
- 28 Air Quality the condition wording is amended to clarify that the requirement for an update to the Air Quality Assessment relates to the outline element of the scheme to confirm the findings of the submitted Environmental Statement.

For completeness, the full wording is shown below.

B2 (Amended) Reserved Matter Approval (Scale, Appearance, Layout, Access, Landscaping)

This permission is granted in OUTLINE, in accordance with the provisions of Article 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 and before any development is commenced, except for Site Preparation Works, the approval of the Local Planning Authority shall be obtained to the following reserved matters:

- (a) appearance;
- (b) landscaping;
- (c) layout; and
- (d) scale
- (e) access

Full particulars of these reserved matters, including plans, sections and elevations and all to an appropriate scale, and any other supporting documents shall be submitted to the Local Planning Authority for the purpose of obtaining their approval, in writing, for each phase of development. The development of each phase shall then be carried out in complete accordance with those particulars.

For the avoidance of doubt, the illustrative drawings submitted in support of the application including those set out within the approved Design and Access Statements are not approved.

Reason: In order to comply with the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) which requires the submission to and approval by, the Local Planning Authority of reserved matters.

B3 (Amended) COMPLIANCE - Time limits for Reserved Matters (Outline)

The first application for the approval of Reserved Matters within the OUTLINE permission hereby approved, as depicted on the approved plans shall be made to the Local Planning Authority no later than the expiration of five years from the date of this permission with all applications for the approval of the remaining Reserved Matters made no later than the expiration of ten years from the date of this permission, and the development hereby authorised must be begun not later than whichever is the later of the following dates, failing which the permission shall be of no effect:

- a) The expiration of five years from the date of this permission OR
- b) The expiration of three years from the final date of approval of any of the reserved matters.

Reason: This condition is imposed by virtue of Section 92 of the Town & Country Planning Act 1990 and to prevent the accumulation of unimplemented planning permissions.

B4 (Amended) COMPLIANCE - Reserved Matters Specification (List of documentation to accompany Reserved Matters Applications)

Each application for the approval of Reserved Matters submitted pursuant to condition 2 shall contain such information set out below as is relevant to the application and shall be consistent with the information approved for the relevant phase pursuant to Condition 29 (Phasing Strategy).

- A statement (including accompanying design material) to demonstrate compliance with the parameter plans, Development Specification and mandatory requirements in the approved Design Code (January 2018) unless otherwise agreed by the local planning authority. The statement will also clearly set out how the application fits with a wider strategy for the submission for all reserved matters in securing a coordinated and coherent approach to phased development.
- A report demonstrating how the measures identified in the approved Culture Strategy (October 2017) have been incorporated into the detailed design, including how the cultural and industrial history of the area has been interpreted in the proposals;
- A report must be submitted that outlines that the environmental information already submitted to the LPA is adequate to assess the environmental effects of the application and inform decision making; or,
- Provides further information, in accordance with regulation 22(1) of the 2011 EIA Regs, to assess the environmental effects of the application and inform decision making.

• An updated commercial strategy detailing how the minimum commercial floorspace requirements are being provided.

Access

- 1) Detailed plans and drawings including drawings to show method of construction, traffic calming measures, drainage, street lighting, kerb alignment, levels, areas of highway visibility and surface treatment.
- 2) A report and plans detailing layout including parking areas, servicing areas and plant areas; and
- 3) A report and plans detailing any necessary temporary layout and landscaping associated with boundary treatment and condition;

Landscaping

- 1) Details of any play equipment proposed for the child play spaces;
- 2) How a coordinated approach to elements such as electricity, water, storage, street furniture will be achieved to avoid cluttering
- 3) If a public market is proposed within the main public square, how it will provide services and ancillary space for storage
- 4) Any landscaping mitigation measures required to mitigate potential wind tunnel effects

Appearance

- 1) Details of rooftop and roofscape in accordance with Design Code (January 2018);
- 2) Details of the wind mitigation measures, including any screening or other measures around balconies or communal amenity areas and how the design of blocks responds to micro-climate issues.

Reason: To ensure the development is consistent with London Plan Policies 3.5, 7.4 and 7.6, Local Plan Policy SP11, and emerging Policy DM1. The Local Planning Authority is satisfied that the pre-commencement requirements of the condition are so fundamental to the development permitted that it would have been otherwise necessary to refuse the whole permission.

(New Condition) COMPLIANCE – Development in accordance with Noise and Vibration Report

- a) Prior to the commencement of each phase of the development hereby approved, except for Site Preparation Works, details of the sound attenuation to protect against externally generated (environmental) noise sources including rail transport so as to achieve the internal ambient noise levels detailed in Table 10.14 (Chapter 10, ES October 2017) and BS8233:2014 shall be submitted to and approved in writing by, the Local Planning Authority. The measured or calculated noise levels shall be determined in accordance to the latest British Standard 8233:2014 Guidance on sound insulation and noise reduction for buildings.
- b) The approved works are to be completed prior to occupation of the development and retained for the lifetime of the development.

c) Prior to first occupation of the development, a Post Completion Report demonstrating compliance with the mitigation measures in A above shall be submitted to and approved by the Local Planning Authority.

Reason: In order to safeguard the amenities, health and safety of neighbouring properties and occupiers and of the area generally, and to ensure compliance with Policy 7.15 of the London Plan (2016)

29. (Amended) PRE COMMENCEMENT – Updated Air Quality Assessment

Part A:

Prior to the submission of any reserved matters, an updated air quality assessment shall be submitted and approved by the Council in line with best practice guidance and other guidance provided by the Council. The air quality assessment will:

- Identify how the building works and related activities and the future operation and use of the development site may impact upon local air quality.
- Model the impact of the development on local air quality using ADMS
 Urban, agreed traffic data, include surrounding developments, all sitewide emission sources (CHP, gas boilers, energy centres) and include
 scenarios of pre-agreed years and worst case,
- Identify mitigation measures that are already part of any planned development and should any risk of exposure to poor air quality be determined, mitigation measures shall be included, where applicable, in the buildings design
- Identify possible additional mitigation measures that may be implemented to maintain and where possible improve air quality in the vicinity of the development.
- Provide full details of measures that will be implemented to maintain and where possible improve air quality in the vicinity of the development.
- Provide full details of measures that will be implemented to protect the internal air quality of buildings.
- Identify measures that will be implemented or continue to be implemented after the completion of the development with clear timescales of when information will be provided.

Part B: All measures identified within the approved air quality assessment that are to be installed during the course of the development will be fully implemented. No occupation will take place until a report demonstrating that each measure is fully implemented has been provided to the satisfaction of and approved in writing by the Planning Authority.

Part C: All measures identified within the approved air quality assessment that will be implemented or continue to be implemented after the completion of the development will be completed within agreed timescales. A report demonstrating that all such measures set out within the approved air quality assessment have

been installed will be provided to the satisfaction of and approved in writing by the Planning Authority.

Part D: No development works will take place for the outline element, until a detailed site—wide Air Quality Assessment in line with guidance from the GLA has been submitted and approved in writing by the Local Planning Authority.

Reason: To protect air quality and people's health by ensuring that the production of air pollutants, such as nitrogen dioxide and particulate matter, are kept to a minimum during the course of building works and during the lifetime of the development. To contribute towards the maintenance or to prevent further exceedances of National Air Quality Objectives.

Local Representations as at 7 February 2018 further comments received prior to committee will be included in a further addendum or reported on the night

A further 11 objections have been received including the Palace View Residents Association. The main comments include:

- The impact on the views from Alexandra Palace
- The height of the blocks and overall density
- Inadequate provision for schools, GP surgeries or any other services for new residents.
- Lack of information regarding 'affordable rents' or social housing
- Scheme should be reconsidered and less housing built
- The Moselle should be de-culverted
- The application does not comply with London Plan and LBH Energy policies
- Carbon off-setting should be paid
- Lack of car parking spaces which will have a knock-on effect locally

A further 4 letters of support have been received. The main comments include:

- Local businesses, start-ups and creative enterprises will be supported
- Amendments to the scheme have addressed previous concerns regarding impacts on neighbouring businesses
- The scheme will provide community and open spaces
- Meanwhile uses will be encouraged during build out

Further observations from Catherine West MP have been received.

Stakeholder	Question/comment	Response
Palace View Residents As	ssociation	
	The impact on the views from Alexandra Palace, where currently buildings are low rise. It was felt that the height of the blocks will seriously damage the view from the park especially from the old racecourse and Newlands Fields area, making the Park feel enclosed and much less of an open space much loved and	The full assessment of harm against mitigation and benefits is addressed in the main body of the report.

Stakeholder	Question/comment	Response
	appreciated by all who use the Park. Also the view from the Palace will be seriously damaged.' Blots on the landscape', 'who wants to live in high rises anymore?', 'people want gardens' were some of the comments made.	
	The sheer density of the development is daunting and there appear to be no plans for schools, GP surgeries or any other services for new residents. There is a paucity of car parking spaces which will have a knock-on effect locally, even on our side of the Park. There seem to be no related plans for improving local transport which is already overcrowded. We can find no mention of 'affordable rents' or social housing both of which are in very short supply especially as homes are going to be demolished to make way for this development.	
	Overall, these plans are viewed with a mixture of horror and suspicion. It is felt that this will damage the quality of the environment and should be seriously reconsidered and far less housing built on what is a relatively small plot of land.	
Electoral Reform Services	Please note the Electoral Reform Services Ltd (ERS) would like to conditionally withdraw their objection made on 21st December to the above planning application.	Conditional support noted. The plans referred to would be secured via any planning permission.
	Subject to the changes set out below being agreed or secured within any planning consent, ERS conditionally	

Stakeholder	Question/comment	Response
	remove its objection and now offer its support for the revised planning application. ERS has had several productive meetings with the applicant, St William, who have agreed to amend the application and/or to undertake mitigation measures which would allow ERS to withdraw their objection.	
	 These are namely: To install blinds and/or a privacy film over the office floor windows of the ERS building that face onto the St William application site. To remove bedrooms on all floors directly facing the ERS building and to insert living/kitchen dining or bathrooms in the flank wall facing the ERS building. This requires the replacement of Plan SK/A1/001 Rev G with SK/A1/001 Rev A option B or any such similar plan (see both plans attached) and for similar plans for all floors of the building. (Note all attached plans are illustrative and we understand that revised plans have now been submitted). A full height transluscent glass screen (or other acoustic barrier to be agreed) on the ground, first and second floors balcony/terrace immediately facing the ERS building as shown (or similar to) on the attached plan and illustration (439 CGW Block A1 Privacy Screen). Again we understand that revised plans have been submitted. Use of the existing temporary car park on part of the site of block A1 or B1 for ERS use until July 	These changes are now reflected in the revised plans. Officers agree that the changes address the issues raised and provide sufficient safeguards for the continued operation of the business.

Stakeholder	Question/comment	Response
	2019 or the provision a suitably fenced and gated, temporary surfaced alternative of similar parking capacity.	
	Resolution of Planning Issues The proposal to install film and/or blinds on the ERS building overcomes ERS objections concerning overlooking and security. The movement of bedrooms away from the ERS face of the building and the insertion of acoustic barriers on the balcony sides facing ERS will mitigate our concerns over noise and disturbance. The use of a temporary car park for the specified period will allow ERS to manage their vehicular access issues.	
	Conditional Withdrawal ERS conditionally withdraws its objections to planning application HGY/2017/3117 if the matters set out above are either resolved between ERS and St William through the passage of the application or when layout and other plans that achieve points 2 and 3 are agreed by the Council. ERS thus removes its objection and offers support for the revised planning application.	
102 North View Road	The proposed buildings are far too high overlooking and overshadowing the two-storey houses in Hornsey Park Road.	The nature of the site along with the design of the proposal minimises the potential for concern from loss of privacy due to overlooking into windows to
	There will be noise and disruption from the building work. The loss of jobs from the closing of Iceland and the business park and the loss of the valued Iceland store for local people.	neighbouring residential habitable rooms or private amenity spaces. The Design and Access Statement shows how the massing has been reduced along sensitive eastern boundary. This

Stakeholder	Question/comment	Response
	No new transport links or public facilities or open space are planned for the thousands more people who will be living here under the scheme. Please rethink this flawed plan!	includes orientating the development to minimise overlooking and loss of privacy. The overall economic impact, including improvement in quality of employment floorspace is judged to be a significant benefit to the scheme. A range of community and public spaces are proposed as part of the scheme and the site benefits from existing high public transport accessibility.
15 Jansons Road	Any consent for this proposal should be conditional on the de-culverting of the River Moselle across the site. To grant consent for this planning application without daylighting the relevant stretch of the Moselle watercourse would be a huge loss of potential amenity to the borough, go against enlightened planning policy with regard to watercourse management, and miss a once in a lifetime opportunity for a visionary approach to regeneration of the site. Local authorities across the country are recognising the value of de-culverting buried water courses in order to aid flood prevention, create vital green spaces for public enjoyment, promote biodiversity, and enhance people's connection with space. Living rivers add a vital additional dimension that strengthens and enhances people's connection with nature. The East of Haringey is an area deficient in green space — the de-culverting and daylighting of the Moselle	Officers accept that it is impractical to open the culvert at this point in time although provisions are in place through the legal agreement to reassess this regularly against agreed water standards. The GLA and Environment Agency have also accepted this position.

Stakeholder	Question/comment	Response
Stakenolder	would help to address this, as has happened with the stretch of the Moselle in Lordship Rec. The de-culverting there has helped transform the park, making it an attractive area to be enjoyed enjoyed by all - a huge environmental improvement in an area of social deprivation. While contaminated water from misconnected drains meant that the Moselle has been quite unpleasant in the past, actions by Haringey Council to remedy this problem have been very successful and the brook is now significantly cleaner. The developers want to keep the river buried, and are proposing a pathway marking the course of the river,	Response
	claiming that de-culverting and daylighting are not feasible because the culvert is too deep. But this is untrue in some places the culvert is just below the surface, and the site could be contoured in those places where it is not. Additionally, Thames Water advises that the water quality is acceptable, and the Environment agency has stated that it believes 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. It notes that naturalising rivers provides flood risk, water quality, biodiversity and recreational benefits for the area. Restoring the Moselle river is required by the Thames River Basin Management Plan (RBMP) under the Water Framework Directive (WFD) and in line with adopted local plan policy DM28 the developers	

Stakeholder	Question/comment	Response
	should comply with this. De-culverting would mean that the development complies with the GLA's London Plan (currently under consultation), which promotes green infrastructure, sustainable drainage, and river restoration in its policies G1, G5, G6, SI13 and SI17. Haringey Council should therefore insist that this deculverting is continued across the Haringey Heartlands site, which would help put the council at the forefront of more enlightened approaches to river management being implemented across the UK, and advise the developer that permission will be refused unless the planes are revised accordingly.	
115 Seaford Road	I think this would make a significant improvement to the environment but also the health of human society as well.	Support noted.
136 Hewitt Avenue	Contrary to developer's claims, this proposal IS feasible, as water quality is already acceptable, and can be improved before construction is completed. Contouring of the site can accommodate varying culvert depths. It's now or never. Failing to open up the river will be a tremendous missed opportunity. The Environment agency has stated: 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. Naturalising rivers provides flood risk, water quality, biodiversity and recreational benefits for the area.	Please see answer above.

Stakeholder	Question/comment	Response
	Restoring the Moselle river is required by the Thames River Basin Management Plan (RBMP) under the Water Framework Directive (WFD) and in line with adopted local plan policy DM28 ¿ the developers should comply with this.	
	The development should comply with the GLA¿s London Plan (currently under consultation), which promotes green infrastructure, sustainable drainage, and river restoration in its policies G1, G5, G6, SI13 and SI17	
Tottenham & Wood Green Friends of the Earth	This is additional material from Tottenham & Wood Green Friends of the Earth, supplementing our earlier comments.	
	1) There is no statement or measureable assessment of sustainability for the new homes in the development. This is needed to deliver the policy requirement in the NPPF, London Plan and local plan. It should be set out and enforced to be delivered on site through the construction process. Why are the Council letting St William of this requirement?	A Sustainability Statement has been provided in support of the application. This addresses current planning policy requirements.
	2) The overheating assessment shows that the homes in the detailed part of the application will be at risk of overheating. This risk is going to increase as climate change increases the urban heat island. What is the Council going to do to reduce and remove this risk?	The overheating assessment is discussed in the main body of the report. A planning condition is recommended to provide further details, and where necessary, mitigation.

Stakeholder	Question/comment	Response
	3) We believe that two energy centres on the site are not	There is no policy requirement to provide
	policy compliant (London Plan 5.6). There should be	one single energy centre; proposals
	only one serving the whole site. This would be more	should be assessed against the energy
	efficient reducing carbon and air pollution emissions,	hierarchy. This is a long-term
	and show mitigation measures have been implemented	development spanning 10+ years. The
	of the impacts in the Environmental Impact	proposed energy centres and wider
	Assessments. Will the smaller energy centre be forced	district centre energy network has not
	to shut down earlier to reduce the impacts	been designed and therefore the exact
	of this? Can the number of energy centres be reviewed	requirements for the energy centres
	and reduced now rather than in the future?	within the outline element cannot be
	40	known at this point in time. The legal
	4) There are no renewable technologies on this scheme.	agreement includes a requirement for the
	This goes against policy at a regional and	applicant to decommission temporary
	local level. This is shocking given that the Council has	energy centres upon any connection to
	recently signed up to being a Zero Carbon Borough	the District Energy Network (to be built
	by 2050. Can this be enforced on the scheme, or would	by LBH).
	the developer be willing to pay for the required	The application has been eccessed
	renewables on this site, to be delivered on schools	The application has been assessed
	across the borough? And can the Carbon Offsetting	against the energy hierarchy. Taking into account the wider benefits of the
	for this development be ring-fenced for community	
	renewables rather than being kept by the developer?	scheme, specifically provision for the DEN, the scheme is judged to be
	5) The Carbon Offsetting on this scheme seems to be	acceptable in energy terms.
	retained by the developer (St William) and it is	acceptable in chargy terms.
	not clear as to why this is being used to fund the	The carbon offsetting is not being
	developer's policy requirements. The Energy Strategy	retained by the developer. Land and
	sets out the Carbon Offsetting will be used to fund a	space for the delivery of the DEN by the
	larger energy centre. As this is Section 106, if extra	Council is being provided in lieu of the
	money is needed to deliver the enlarged energy centre,	carbon offset. This must also be
	this should be funded through Community Infrastructure	balanced with the overall viability of the
	Levy. Using the expected Section 106 Carbon Offsetting	scheme. The Carbon Offset forms part

Stakeholder	Question/comment	Response
	Funds for commercial requirements look like breaking state aid rules. There are also no costs as to the build of this new energy centre. What if the costs of building the new energy centre are more than the expected Carbon Offsetting requirements or less? Why is the developer being allowed to keep this money?	of the planning policy framework and there is no 'state aid' issue. These policy requirements must be considered in the overall planning balance, together with the scheme's wider economic, social and environmental benefits.
	The carbon offsetting cost for the development should be - 1,373 (tonnes of carbon to be offset) x £95 (new cost of carbon London Plan 2017) x 30 years = £3, 913, 050 over the full development	These policy requirements must be balanced in the overall context of scheme viability.
	6) The AQ modelling in the EIA does not include the collective AQ impacts / emissions from adjacent developments. This is a requirement set out in Schedule 4 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. These cumulative effects should include impacts from the neighbouring developments at: - Cultural Quarter development site (the Chocolate Factory), - Bittern Place development site; and - Iceland Site development site	The EIA has considered the cumulative impacts, including those schemes within 350m. These were scoped during the earlier preparation of the Environmental Statement. The full details of some of the schemes cited are still emerging and were not available at the earlier scoping stage so could not have reasonably be included. Officers are satisfied the full environmental impacts have been assessed. A further planning condition is proposed to require a further assessment of the outline element of the
	7) The AQ assessment has modelled stack heights of 3m above the roof height of block A4. Block A4 is the proposed location of the SE energy centre. There is a discrepancy between the Energy assessment and the AQ assessment. The Energy Assessment states that the stack heights are 2m above roof height of the tallest building. Which is correct, as this will impact on the modelling and local air quality in Wood	assessment of the outline element of the scheme, prior to commencement which will be an opportunity to update the modelling to take into account further information should it be available. The Air Quality assessment used the following "One gas-fired CHP and three

Stakeholder	Question/comment	Response
	Green? 8) The masterplan plan indicates Energy centres below	gas-fired boilers are proposed as part of the Development. The proposed heating plant would release emissions through
	many of the residential blocks and commercial units. The emissions from these energy centres should modelled and the emissions impacts on these units above the Energy Centres should be assessed and mitigation highlighted.	flues at 3m above roof level of Block A4 of the Development." The exact flue height is provided in Chapter 5. "The flue will be situated within Building A4 and terminates at a height of 78.2m Above Ordnance Datum (AOD)."
		No heights for the outline can be specified as final building heights not known.
		The applicant undertook a detailed and extensive scoping process with Haringey and the choice of model was agreed via the EIA Scoping Report, see Table 9.1 of Chapter 9: Air Quality of the Environmental Statement and Appendix 9.3 but will be updated for the purposes of the outline element.
10 Bedford Road	I object to the proposal - unless de-culverting is incorporated. My reasons for this include: The development should comply with the GLA¿s London Plan (currently under consultation), which promotes green infrastructure, sustainable drainage, and river restoration in its policies G1, G5, G6, SI13 and SI17.	Officers accept that it is impractical to open the culvert at this point in time although provisions are in place through the legal agreement to reassess this regularly against agreed water standards. The GLA and Environment Agency have also accepted this position.

Stakeholder	Question/comment	Response
	This proposal IS feasible, despite the developer's claims otherwise, as water quality is already acceptable.	
88 Umfreville Road	I understand that the planning application does not include de-culverting the hidden Moselle river - a once-in-a-lifetime opportunity to increase biodiversity and green space in the area as well as improve water quality in the river downstream. I gather the developers should have taken this into account in their planning as per notes below and that deculverting is perfectly feasible.	As above.
	The Environment agency has stated: 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. Naturalising rivers provides flood risk, water quality, biodiversity and recreational benefits for the area.	
	Restoring the Moselle river is required by the Thames River Basin Management Plan (RBMP) under the Water Framework Directive (WFD) and in line with adopted local plan policy DM28 ; the developers should comply with this.	
	The development should comply with the GLA;s London Plan (currently under consultation), which promotes green infrastructure, sustainable drainage, and river restoration in its policies G1, G5, G6, SI13 and SI17	

Stakeholder	Question/comment	Response
7 Ellesmere Road	On my visits to Tottenham I can see the value of the Moselle River where it is already de-culverted. I think that the river is an asset to the area, and I object to this Planning Application unless de-culverting of the Moselle River is incorporated in it.	As above.
40 Lausanne Road	I object unless more vision is incorporated including allowing the River Moselle to see daylight again.	As above.
8 Conway Road	I object to the proposal, unless de-culverting the Moselle River underneath it is incorporated. It's now or never. Failing to open up the river will be a tremendous missed opportunity. Contrary to the developer's claims, this proposal IS feasible, as water quality is already acceptable, and can be improved before construction is completed. Contouring of the site can accommodate varying culvert depths.	As above.
	The Environment agency has stated: 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. Naturalising rivers provides flood risk, water quality, biodiversity and recreational benefits for the area. Restoring the Moselle river is required by the Thames River Basin Management Plan (RBMP) under the Water Framework Directive (WFD) and in line with adopted local plan policy DM28 the developers should	

Stakeholder	Question/comment	Response
	comply with this. The current proposal is unimaginative and a hugely wasted opportunity.	
	The development should comply with the GLA's London Plan (currently under consultation), which promotes green infrastructure, sustainable drainage, and river restoration in its policies G1, G5, G6, SI13 and SI17	
	Please do not approve this development until the Moselle is brought back to daylight. We live in a borough with little green space and waterways as it is. Open this up to the public will support the amenity of local residents' health and mental health and local wildlife too.	
	Thank you for considering this comment.	
63 Lymington Avenue	I object to this application unless it includes an enforceable commitment to de-culverting the Moselle Brook. Contrary to developer's claims, de-culverting the Moselle IS feasible, as water quality is already acceptable, and can be improved before construction is completed. Contouring of the site can accommodate varying culvert depths.	As above.
	It's now or never. Failing to open up the Moselle will be an irresponsible missed opportunity.	
	The Environment agency has stated: We believe there is a great opportunity at the site to de-culvert the	

Stakeholder	Question/comment	Response
	Moselle Brook and restore the designated main river to a more natural state. Naturalising rivers provides flood risk, water quality, biodiversity and recreational benefits for the area.	•
	Restoring the Moselle is required by the Thames River Basin Management Plan (RBMP) under the Water Framework Directive (WFD) and in line with adopted local plan policy DM28 the developers should comply with this.	
	The development should comply with the GLA's London Plan (currently under consultation), which promotes green infrastructure, sustainable drainage, and river restoration in its policies G1, G5, G6, SI13 and SI17.	
The Gas Works Project, Mandarin Wharf, 70 De Beauvoir Crescent	I am writing to you to outline what I believe are the many and varied benefits of The Gas Works Project meanwhile scheme and the Clarendon Gas Works final development. The two are intrinsically linked. I am the founder and director of The Mill Co. Project (TMCP), a thriving social enterprise business that provides high quality, mixed-use affordable workspace, co-working space and hotel space for artists, designers and creative SMEs in London. My team and I currently have 11 buildings (totalling 250,000 sq ft) and support just under 250 creative businesses.	Support noted.
	Seven of the buildings sit under the TMCP umbrella. The other four are Special Project Vehicles (SPVs). For the most part these SPVs are partnerships with established	

Stakeholder	Question/comment	Response
	developers and are long-term, sustainable projects. We animate meanwhile spaces before taking long-term head leases on the commercial spaces within final developments. The meanwhile sites do two things:	
	They generate significant social, cultural and community capital. They inform how the final commercial spaces should be configured and built out. The meanwhile phases effectively act as 'development and discovery' periods.	
	Regardless of the lifespan of a particular project, all of them deliver collaborative environments that enable tenants to prosper and grown. Over the years many of our tenants have evolved from embryonic businesses to become highly regarded and profitable SMEs. We work to create spaces that improve communities. We bring about sympathetic and holistic regeneration.	
	The plan for the Olympia Trading Estate is in line with our other SPVs, in the sense that the meanwhile will transition through to the permanent. It is a long-term project.	
	For phase one we will set up The Gas Works Project, a meanwhile social enterprise scheme that will stand for three years before work starts on the final St William development. We will reanimate three office blocks and adjoining warehouses to create a genuinely affordable, vibrant and bustling workspace and community hub. In	

Stakeholder	Question/comment	Response
	part it is about reanimating a drab and uninspired corner of Wood Green.	•
	Local businesses, start-ups and nascent artistic and creative enterprises will be brought in and brought along. Dexterous makers and practitioners of different disciplines will prosper and grow. There will be different-sized workspace and maker space studios, a brewery, a performance space run by an immersive theatre company and a bustling street food market and community hop garden. We will do all of this and retain two of the three existing businesses currently based at the site.	
	Key points to note.	
	A new community space The Gas Works Project is not just about commercial workspace. There will be public realm, community areas and amenities too. The access road at the back of the plot will be reimagined and lined with planters and foliage. And open to everyone. At the north end of the road (next to the brewery and tap room – also open to the public), will be a hop garden and outside bar. We are in discussions with an immersive production company to take warehouses two, three and four. When said company is not using these spaces (they tend to put on their productions in the evening), they will be made available to community groups, local schools and arts organisations.	

Stakeholder	Question/comment	Response
	A new home for Collage Arts Warehouse one at The Gas Works Project will be taken by Collage Arts. They will be transitioning from Chocolate Factory Three on the opposite side of Coburg Road. Collage Arts is being forced to leave its current premises by the landowner. There was wide-scale disquiet that the Collage Arts tenants – circa 100 artists and creatives – would be losing their work studios and have nowhere to go. These businesses will have a new home at The Gas Works Project and jobs will be protected.	
	Protecting a successful local business – Turnaround Publishing Turnaround is an independent publishing house that was founded in Haringey in the late 1980s. It is a local business success story and today employs over 40 full time staff, most in administrative and creative roles. They currently have an office and distribution centre on the site. While their distribution centre will move permanently from the Olympia Trading Estate, their offices will stay – for the meanwhile Gas Works Project phase and hopefully final scheme.	
	Phase two is the final development – Clarendon Gas Works (St William working title). We will work with St William to design and build a significant portion of the workspace and commercial units for the final scheme, with the intention of taking a long-term head lease on these areas. We will implement an altruistic decant transition strategy wherein those businesses that thrive	

Stakeholder	Question/comment	Response
	at The Gas Works Project effectively stay on-site. They will take space at Clarendon Gas Works and continue to develop and grow. They will be ingrained in the masterplan and entrenched in the local community.	
The Goodness Brewing Company	I am the founder of The Goodness Brewery & Tap. We are at an advanced stage of discussions with Nick Hartwright at Mill Co. to take one half of the fifth warehouse unit at The Gas Works. To say that we are excited about this opportunity is a huge understatement. It is a real game-changer for us and we cannot wait to fit out the brewery and tap room, set up the outside hop garden and start operations. My business partner Zack and I are both from the area with children in local schools – we are certainly not Haringey hipsters and we are not coming to The Gas Works to make a quick profit and then leave. For the last two years we have been running a community hopping project called Wood Green Hopping, the purpose of which is to get local people growing hops together. We have brewed a harvest time 'green hopped' beer and we've also helped dozens of people learn how to make it for themselves and got our members involved in the whole process of brewing wherever we could. We are	Support noted.
	incredibly passionate about what we do – we've seen people come together through hopping. They get their hands dirty, they have fun, and they have conversations about how we can all work together to better the local community. We feel The Goodness Brewery & Tap will	

Stakeholder	Question/comment	Response
	be an extension of this and allow us to have an even wider programme of community engagement. At The Gas Works we will be brewing ales and selling them in the tap room and the bar at the back of the development. The tap room will be a public space – we will programme events there but it will be available to	
	hire too (at competitive rates). We want to be a flagship, long-term tenant at The Gas Works. Our ambition is to stay on site for the duration of the temporary phase and then transition over to the final development. That is three years down the line. We'll have up-scaled by then and see no reason why we can't supply our ales to the restaurants, pubs and bars situated on the final development.	
Turnaround Publisher Services	I am writing to you to pledge my support for the Gas Works Project temporary site, and the final Clarendon Gas Works site to be built by St William. Along with the other Directors at Turnaround, I think it is a commendable long-term scheme and we are excited to be part of it. You are probably aware of Turnaround Publisher Services. We like to think of ourselves as a Wood Green business success story. We are an independent company providing services to international corporate and independent publishers. We started in 1984, and moved to Wood Green in 1996. In our 34 years of trading, we have earned and cultivated an esteemed reputation as an internationally renowned company providing first class sales and distribution services to the national international publishing community. Today we	

Stakeholder	Question/comment	Response
	emply over 50 full time staff. Many of our employess work in creative and administrative roles.	
	We have been speaking to Nick Hartwright at the Mill Co. Project and Ashley Spearing at St William for a long time about the proposed plans. Both of them have been extremely supportive of use and they recognise the good work we have done.	
	We know that Wood Green is changing and we want to stay where we are and be part of the transformation. Nick and Ashley understand this. Together we have developed a strategy wherein the Turnaround Publisher Services head office stays at the Olympia Trading Estate for the temporary phase of the project, with a view to us moving in to new bespoke permanent offices when the final developed is erected.	
	The scheme offers many benefits to us. It will raise our profile in the community (right now the Olympia Trading Estate is quiet and hidden away), and the rent prices being discussed are very competitive. There are lots of public facing parts of the project that will attract local people – we want to engage more with the local community and get involved in the outreach programmes that will be put on.	
	We firmly believe that this scheme will deliver positive regeneration. We really hope it happens and look forward to being part of it.	

Stakeholder	Question/comment	Response
Grow 22	We are Luke Newcombe and Hugh Chapman, cofounders of GROW N22. We're writing to tell you that we give our full support to The Gas Works Project scheme planned for the Olympia Trading Estate in Wood Green.	Support noted.
	Inspired by projects like Grow Elephant and the Skip Garden at King's Cross, we're working with Nick Hartwright's team to transform the yard area at Olympia Trading into a vibrant garden and community growing space. Our plan is to create a beautiful green space where tenants and visitors to The Gas Works Project can work and relax, complimenting the food offer at the food court space, drink from the brewhouse and events in the events spaces. In the longer term we hope that the GROW N22 initiative at The Gas Works Project can expand into the Haringey Heartlands development.	
	Grow N22 exists to transform unlikely, disused and neglected spaces across Haringey into community gardens and growing spaces made for and by local people. We're a young organisation with big ambition. Luke Newcombe has been managing Westbury Banks Nature Reserve since April 2017. So far there have been 18 sessions involving 30 local volunteers who have given over 350 hours of their time to clear rubbish and create a pathway through the site and tackle the ongoing task of weeding and pruning overgrown shrubs, ferns and trees. Over the course of the past year Luke has also been involved in community gardening	

Stakeholder	Question/comment	Response
	workshops organised by the Friends of Ally Pally Railway Station, Parkside Malvern Residents Association, and Palace Gates RA. He is also leading a project at New Southgate Railway Station and is supporting Karen Loasby who wants to develop a garden at Blue House Yard. He is a partner in Noel Park Big Local and an active member in the London National Park City Campaign.	
	Since July 2017 Hugh Chapman has been leading a project to create a garden in the car park at Green Rooms Hotel with the help of local volunteers. This project is a partnership between Green Rooms Hotel, Dukes Gardens and Sanctuary Housing. The 'hard landscaping' phase of the project is now almost complete and we're planning a series of community workshops to finish planting the garden, aiming for a public launch in April.	
	Giles Christian is the most recent addition to the Grow N22 team. Whilst a keen amateur gardener he brings his business background to the partnership, focusing on strategy and ensuring a sustainable future for Grow N22. He also looks after stakeholder engagement for Friends of Ally Pally Station and is currently working with Luke on the New Southgate Station partnership with Great Northern.	

Stakeholder	Question/comment	Response
Catherine West MP	Whilst progress has been made since early discussions, there are still a number of changes which should be made:	
	1) Genuinely affordable rent levels (i.e. Council or target/social rent) are still too low. Only 95 households from the housing waiting list in Haringey stand a chance to benefit from this scheme which totals 1,700 new households.	The one bed and two bed units rents are capped at local housing allowance caps and will provide for local housing need. The level of affordable housing provided is above the level that has been determined to be viable. This is a marked improvement over the extant permission.
	2) There is too little provision of three and four bed homes, failing to address Wood Green's high numbers of children living in overcrowded conditions.	The three and four bed units are weighted towards the social rented portion.
	3) Construction of Block C1 will begin next month if permission is granted at Committee on 12/2/18. The block will contain one hundred flats, none of which contains a single affordable unit.	The private tenure of Block C7 was approved under the extant consent. Subject to consent of the new masterplan, St William will submit a phasing plan providing further information of the proposed build sequence and tenure split of each phase across the whole scheme that will set out the proposed delivery of the affordable housing. St William will accept a planning condition on occupation restrictions that

Stakeholder	Question/comment	Response
		will ensure the delivery of all affordable prior to an agreed proportion of private homes.
	4) I have yet to receive reassurances that this Development will not be marketed 'off plan' to overseas investors who will leave flats empty or charge extortionate rents, forcing up the Housing Benefit bill to the public purse.	The Berkeley Group have signed up to the Mayor of London's 'First Dibs for Londoners' initiative in which homes under £350,000 will be marketed to UK buyers for three months before any overseas marketing can take place, with Londoners being offered 'first dibs' upto the first month of this period. Furthermore St William will also commit to ensure that Shared ownership homes will be marketed for the first two months to persons who live or work in Haringey.
	The viability assessment is often quoted as why this large development cannot be done in a more acceptable manner, by providing more social homes, marketing flats to Londoners before overseas investors and building the social units first. However, I understand, that St William, the developer, paid its chief £31million in profits last year, which makes me doubt that the developer is not able to make Development in London viable.	The viability assessment has been independently assessed on behalf of the GLA and LB Haringey and confirms that as a result of the additional CIL and s106 charges which now apply (£32.5M CIL and £1.4M), the maximum reasonable percentage affordable is 8%. This compares to 24.4% affordable with £8.0M of s106 contribution in the extant permission. The proposal of 32.5% is

Stakeholder	Question/comment	Response
		therefore providing substantial betterment
		above the maximum reasonable affordable
		housing level.