

Weston and Haringey Parks Residents' Association

Development Management Support
Planning Service
Level 6, River Park House
225 High Road
Wood Green
London
N22 8HQ

21st August 2017

Dear Sirs,

RE: PROPOSED DEVELOPMENT, HORNSEY TOWN HALL, CROUCH END
Reference: HGY/2017/2220

Following the planning submission for the above site, we are writing to ask you to refuse permission.

Whilst we are in favour of restoring the Town Hall, we believe that the development proposal needs to be looked at in more depth in relation to its site, its environment, and lack of social housing. It then becomes apparent that it is not a good design for this location. We ask the council to refuse planning permission for the scheme for the following reasons (in summary, expanded below):

- 1. Inadequate and incorrect information**
- 2. Height in relation to the neighbourhood; Urban Context**
- 3. Effect on Listed buildings and Conservation areas**
- 4. Massing, Footprint and Daylight**
- 5. Density and Lack of Amenity Space**
- 6. Lack of social housing**
- 7. Transport, Parking and Vehicle Movement**
- 8. Deficiencies in Social Facilities and Infrastructure**
- 9. Reduction of office space**

1. Inadequate and incorrect information supplied at pre-application residents meetings and with planning application.

VIEWES: We are unsatisfied with the photomontage views submitted with the Town Hall application. These views show trees in full leaf. In addition, the plans show trees as having been removed on the corner of the library (adjoining the access), yet the photomontage has retained these and used them to block the view to the new building (block A). The submission shows views from Alexandra Palace and Parkland Walk of such poor resolution that we cannot enlarge these.

We need to see

1. Views without the trees in leaf, ie a winter view or trees dotted on (which is preferable).
2. Views from different angles (where they are not blocked by trees)
3. More views from Haringey Park, looking back towards block A.
4. Views form Primezone Mews
5. View from library to block A (without the tree in place).
6. Views of better resolution from Alexandra Palace and Parkland Walk

APART HOTEL: The drawings show hotel rooms with kitchenettes – clearly apart hotel rooms. Yet the HORNSEY TOWN HALL PLANNING STATEMENT (July 2017) refers to a Hotel. Which is the correct proposal?

We ask the planners to write to us directly as soon as this further information has been supplied.

2. Height in relation to the neighbourhood; Urban Context

The proposed new buildings are much too high, bearing no relation to the surrounding conservation area.

HORNSEY TOWN HALL PLANNING STATEMENT (July 2017) (HTHPS) 2.25 states that: *“Weston Park runs along the north of the site and comprises residential properties that back on to the application site. The buildings range between 3 and 4 storeys and are predominantly brick built.”*

This is incorrect.

Haringey's Conservation Area No.5 Conservation Area Character Appraisal (7.4) says Weston Park is: *“lined by two storey terraces with attics and semi-detached properties all of which are considered to make a positive contribution to the character and appearance of this part of the conservation area.”* It goes on to say (7.7) that houses on Weston Park:

“...give the appearance of large semi-detached properties but are linked by set back side extensions. They have steep, hipped, slate roofs and include a mix of single-fronted and double-fronted street elevations.”

Haringey Park, also adjoining the site, is made up essentially of two storey semi-detached dwellings described in Haringey's Conservation Area No.5 Conservation Area Character Appraisal as “Victorian Villas” (6.6 to 6.10). The four storey Mansion block flats on Haringey Park, are not typical of the area and these are further away from the development site.

Adjoining the site is the Library which currently sits in an open area.

Haringey's Conservation Area No.5 Conservation Area Character Appraisal (2.4) discusses the character of Crouch End as:

“...an almost village like development nestling in the bowl between the hills rising in the north to Muswell Hill and Alexandra Palace.”

HTHPS makes reference to the following policies in its submission:

7.86 states that: *The Mayor's Housing SPG advises that, through scale, material, massing and building type, development should take account of the existing character and urban grain of a place and build on its positive elements (para 2.2.3).*

7.87 Strategic policy SP11 requires all development to respect their local context and character, creating and enhancing the Borough's sense of place and identity.

7.88 Draft Development Management Policy DM1 states that development proposals should relate positively to their locality, having regard to form, scale and massing prevailing around the site.

7.89 Draft Development Management Policy DM6 expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieving a high standard of design.

However, analysis of the above Mayoral, London and Local policies, together with the findings in Haringey's Conservation Area Character Appraisal, shows clearly that the proposed construction of blocks A and B, with heights of 5, 6 and 7 storeys, is an inappropriate development in this Conservation area where the majority of buildings are dwellings of 2 storeys, and where Crouch End has been described as having a “Village” feel. Furthermore, in the detailed design of the proposed development there is insufficient modulation both in the roofline and frontages to reflect the architectural rhythm of the surrounding area. The proposed buildings appear to have more in keeping with the new developments at Kings Cross than in this Victorian London Suburb.

3. Effect on Listed buildings and Conservation areas

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

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

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

4. Massing, Footprint & Daylight

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

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

We disagree with the following:

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

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

We draw your attention to The BRE guidelines extracted below:

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

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

It is valuable for a number of reasons:

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

AND:

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

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

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

5. Density

The proposed development is for 146 units. The applicant has calculated the density as 162 units per hectare.

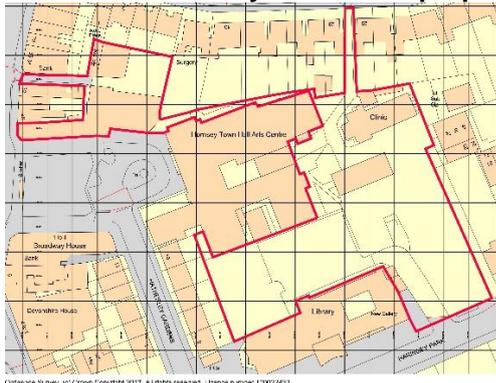
HTHPS Policy Context 7.75 illustrates the London Plan Policy 3.4, showing its table 3.2 - Density Matrix (habitable rooms and dwellings per hectare). The developers note that the site is in an area with a PTAL rating of 2 to 3 (which is actually at the lower (poor) end of the scale) and suggest that as a density of 45 -175 units per hectare is allowable, they argue that a density of 162 dwellings per hectare should be acceptable.

This is an incorrect and flawed argument.

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

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

Site area for Density calculation purposes:



Actual site area for density calculations: **0.78 hectare**

Residential units: **146**

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

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

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

Lack of amenity space

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

6. Lack of social housing

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

7. Transport, Parking and Vehicle Movement

Inadequate Public Transport

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

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

Vehicle Movement

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

Parking

40 Parking spaces is an inadequate provision for 146 flats and hotel or aparthotel rooms. Whilst we understand the council will not issue more residents permits, the situation at present is that car owners simply move their cars from one zone to another within Crouch End CPZ depending on the timing of parking restrictions. Evening parking is extremely difficult at present and with such scant provision for this development, the situation will become worse.

Similarly there are no car parking facilities for social events in the Town Hall and this too will have an impact on available parking in surrounding streets.

HThPS Policy context (7.15c) states that Emerging Development Management Policy DM53 sets out a number of tests for hotel uses to be acceptable including: *“Provide appropriate arrangements for pick up / drop off, service delivery vehicles and coaches, appropriate to the size of the hotel or visitor accommodation.”*

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

8. Deficiencies in Social Facilities and Infrastructure

Inadequate infrastructure – lack of local schools, doctors surgeries.

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

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

9. Reduction of office space

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

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

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

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

Yours faithfully

WESTON AND HARINGEY PARKS RESIDENTS’ ASSOCIATION

including the following people:

Ruth Selig and Stephen Richter	53 Weston Park N8
Caroline Clayton and Mike Clowes	55 Weston Park N8
Fitzroy and Joan Thomas	59 Weston Park N8
Iain Lanyon and Sharon Kean	10 Sandringham Gardens N8
Andrew Zweck	14 Haringey Park N8
Kathy Smith	23 Primezone Mews N8

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

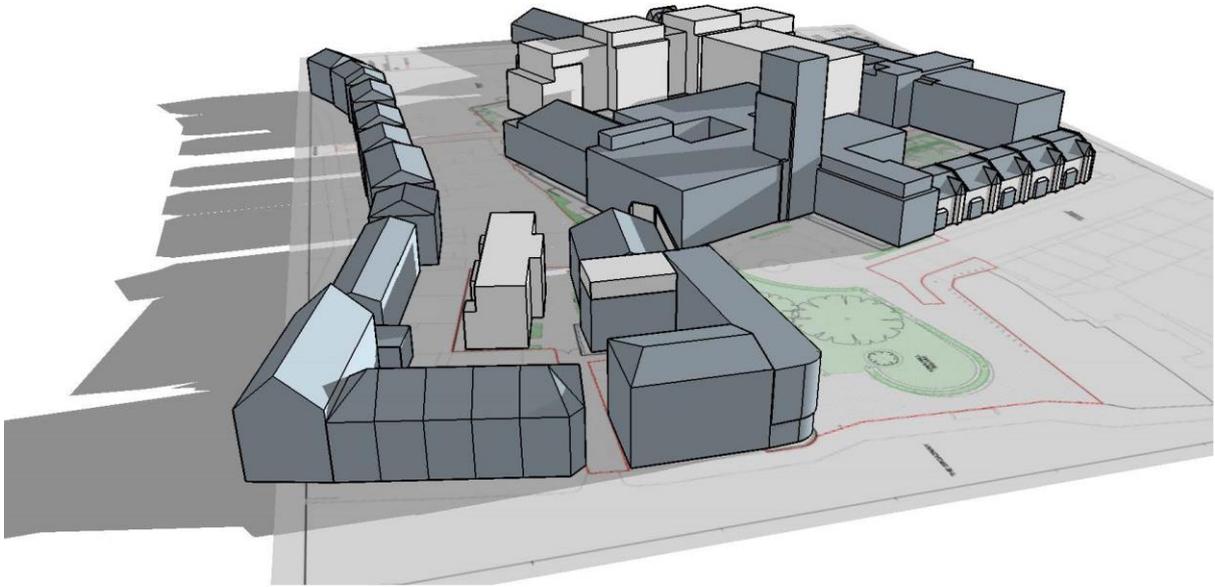
3D MODELLING TO SHOW RELATIVE SCALE AND OVERSHADOWING. To the best of our knowledge these are to scale but we wish to see the same interactive model produced by the applicant



View showing Hatherley Gardens with the new flats looming behind



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



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



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



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