

Argles James

Subject: FW: An objection to planning application HGY/2017/2220

From: Adrian Essex

Sent: 26 September 2017 11:35

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Dear planningcustomercare@haringey.gov.uk

I am submitting this objection to the proposals for the Town Hall in accordance with [the guidance on the Haringey website](#). I have chosen the email route.

My name is Adrian Essex

My address is:

7 Fairfield Road , Crouch End, London, N8 9HG

Please find below my **objection** to the suite of planning applications currently under consideration for Hornsey Town Hall under references HGY/2017/2220 HGY/2017/2221 and HGY/2017/2222.

I am sending this **objection** as an email because it contains links to the documents to which I refer, and images which form part of the objection.

I have based my **objection** on the [Designing Buildings Wiki](#) which contains a list of headings of objections that are generally valid.

Based on this **objection** I would ask you please to reject the application.

Please note that this is an **objection**. These are not comments.

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2. The proposed development is contrary to national, regional or local planning policy, government circulars, orders or statutory instruments.
3. The proposed development is not in keeping with the stylistic context or scale of the local area.
4. The proposed development will have a negative impact on the amenity of another property, through noise, overlooking, overshadowing, smells, light pollution, loss of daylight, loss of privacy, dust, vibration or late night activities.
5. The proposed use is not compatible with existing uses, for example an industrial use in a residential area.
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8. There is a history of rejecting similar developments in the area.
9. Approval would create a precedent meaning that it would be difficult to object to similar proposals.
10. Local infrastructure is not adequate to service the proposed development.
11. The proposal is a piecemeal development that would prevent proper development of the area. - not applicable
12. The proposal will have an economic impact, such as impacting on tourism or on small businesses.
13. The proposal will have environmental health impacts such as the use of hazardous materials or ground contamination. - I have found no evidence of this in the application.
14. The proposed development will impact on listed buildings or a conservation area.
15. The layout and density of the proposed development is inappropriate.
16. The proposal is an inappropriate development within a green belt. - Not applicable

17. Proposed advertising creates visual clutter.
18. The proposed development includes insufficient landscaping.
19. The proposed development will demolish or adversely affect an ancient monument or site of cultural or architectural value.
20. The proposed development will damage the natural environment or will result in significant loss of trees or the loss of trees for which tree protection orders are in place.
21. The cumulative impact of the development when considered alongside other development will have an adverse impact on the area.
22. There is inadequate access for people with disabilities.
23. Archaeological issues.
24. The type of housing proposed will not satisfy local housing needs.

The proposed development is contrary to national, regional or local [planning policy](#), government circulars, orders or statutory instruments.

Please see throughout the text for instances where the proposals contravene policy, which include:

[The Crouch End Conservation Area Character Appraisal](#)

[Haringey's Economic Growth Strategy](#)

[Policy DM40 of the local plan](#)

[Policy SP8](#)

[The London Plan](#)

[Government guidance](#) on conserving and protecting the Historic Environment.

National Planning Policy Framework - [paragraphs 6-10](#) , [Core Planning Principles paragraph 17](#) , and [paragraphs 126-141](#).

The proposed development is not in keeping with the stylistic context or scale of the local area.

I wish to object to the Hornsey Town Hall planning application ref HGY/2017/2220 on the grounds that the proposed tower blocks are out of character with the area. It is proposed that in the car park behind the Town Hall there be two tower blocks, and that in the mews there be a further block of residential accommodation.

The two tower blocks are to be of 6 and 7 storeys. This is inappropriate for the conservation area which Haringey's own assessment states to be of primarily two storey terraces.

The tower blocks will dominate the views of both the Town Hall and the Library, which is inappropriate for listed buildings, as it fundamentally alters the context into which the architect set them.

[Haringey's own planning department](#) (ref HGY/2013/1282) took this view in respect of a much smaller addition to a nearby building, 2-4 The Broadway N8 9SN, which now houses Waterstone's,

where permission was refused in part on the grounds that

"The proposed roof extension, by reason of its size, scale and prominent location, would be out of keeping with the design and character of the existing building, and would have adverse effect on the appearance of the property and the visual amenity of the conservation area as a whole."

There are no other buildings in the conservation area of 5 storeys or higher. Granting permission for these might create an unwelcome precedent and lasting changes to

"...an almost village like development nestling in the bowl between the hills rising in the north to Muswell Hill and Alexandra Palace." [Crouch End Conservation Area Appraisal](#)

Please reject the planning application HGY/2017/2220 on the grounds that it would be out of keeping with the design and character of the nearby listed buildings, and would have an adverse effect on the visual amenity of the conservation area as a whole

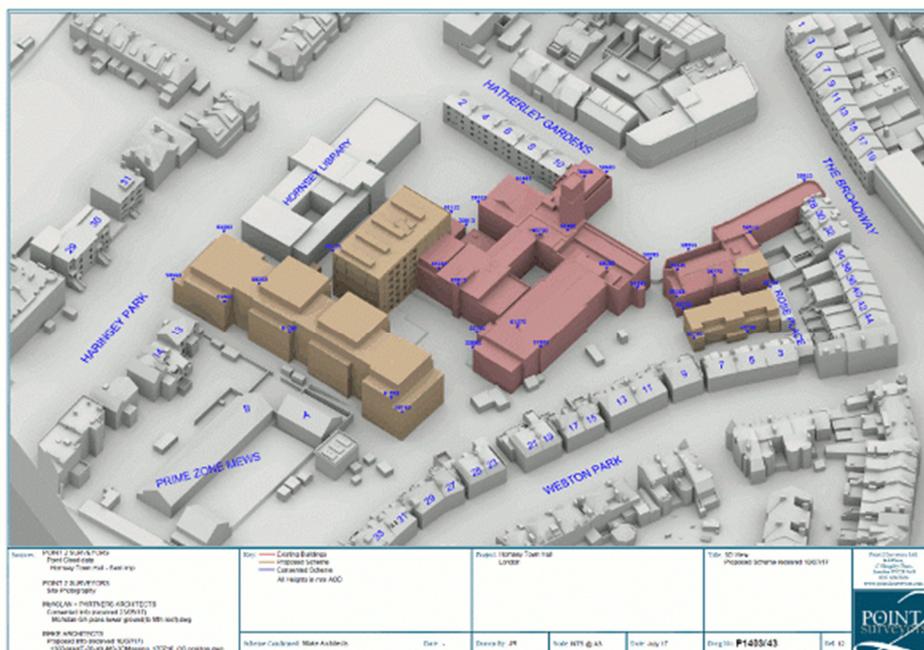
The proposed development will have a negative impact on the amenity of another property, through [noise](#), overlooking, overshadowing, smells, [light pollution](#), loss of daylight, loss of privacy, [dust](#), vibration or late night activities.

I wish to object to the Hornsey Town Hall planning application ref HGY/2017/2220 on the grounds that the proposed tower blocks will affect the amenity of neighbouring houses, that they will reduce the amount of sunlight and that neighbours will be over looked.

Notwithstanding any pre-existing permissions the scale and height of the proposed new blocks is greater than those previously granted permission. There was considerable opposition to the height of the blocks at that time, and the permission granted was exceptional. On that occasion Haringey was granting permission to itself. The blocks are set to be built closer to the site boundaries, there fore much closer to the neighbouring buildings than in the previous permission. This can clearly be seen in the attached file (a .gif file where alternating images are displayed). The two images that make up this illustration are taken from MAKE's files as supplied to support the application. It can be seen that the 2017 application, shown in beige) requires much taller blocks than the 2010/2013 permission (shown in lilac) and that these blocks are set much closer to neighbours in Haringey Park, Weston Park and Primezone Mews. This causes problems of over shadowing, over looking and loss of amenity due to the proximity of the proposed buildings.

While the applicant has produced studies designed to show that the loss of amenity, the overlooking and the loss of daylight in neighbouring gardens and houses is acceptable, these calculations are based on flawed figures in the 2010 application.

Please reject the application for these reasons.



The proposed use is not compatible with existing uses, for example an industrial use in a residential area.

Broadly speaking the mixed use proposed is acceptable with the exception of the hotel. This is locally unpopular; it is on the very edge of acceptability in transport terms (the site only achieves PTAL 2/3); it will displace a very considerable amount of local employment (c 75 companies and 130 employees)

The development may cause traffic problems such as traffic generation, access or safety problems.

The applicant has provided [a transport assessment](#), a [travel plan](#) and a [plan for deliveries and servicing](#). These are very poor documents which make very fundamental errors. Several of the tables in the transport assessment assume that travellers based in Crouch End can use the underground station at Finsbury Park without first using some other form of transport. They cite Crouch Hill as a useful station, though the majority of departures from Crouch End will be to the south (City and West End) while trains from Crouch Hill run largely East-West. There is mention of a shuttle bus, though how it will operate is not clear, nor where it will pick up and drop off. There is talk of a taxi rank, though not where it might be. Transport for London has submitted a response to the application indicating problems and seeking financial help to address them.

The travel plan is little more than a set of pious hopes, anticipating that if you explain a problem to potential travellers they will help to solve it.

The 15 pages of text relating to **Deliveries and Servicing** describe a wholly **inadequate situation**. A total of **sixty one 1,100 litre Eurobins** are mentioned, excluding waste from cafes etc. These would make an 80m train (almost the length of block A) to be moved manually up from the lower ground floor to an **undefined area for regular collection and emptying**. **Forty three service and refuse**

vehicles requiring access to the site per day are referred to, (the schedule shows **54**) with a **service yard that only accommodates one large vehicle** at a time! Taking the lower number of forty three, this equates to **seven trucks per workable hour** (or **ten p.hr** in the more limited hours of Saturday) and the report suggests that the management system will **synchronise them by phone!** What happens to **fire engines and ambulances** that need manoeuvring space and access to every part, when say a pantechnicon **occupies the sole loading bay?**

Given that the travel and transport arrangements are so poorly assessed this application should be rejected

The proposal reduces the amount car parking available or provides insufficient parking space itself.

The amount of car parking space is dramatically reduced. the development takes place on two car parks, one of which currently serves the library, and another which is often full of service vehicles supporting activities in the Town Hall.

The proposal provides a very limited number of parking spaces, and further proposes to ensure that residents of the new premises will not be granted permits for controlled parking zones. Either this will lead to the circumvention of the proposed restrictions with resultant increased parking in an already crowded location, or additional pressure on the public transport.

There is a [history](#) of rejecting similar developments in the area.

- [Haringey's own planning department](#) (ref HGY/2013/1282) took this view in respect of a much smaller addition to a nearby building, 2-4 The Broadway N8 9SN, which now houses Waterstone's, where permission was refused in part on the grounds that

"The proposed roof extension, by reason of its size, scale and prominent location, would be out of keeping with the design and character of the existing building, and would have adverse effect on the appearance of the property and the visual amenity of the conservation area as a whole."

Pre- planning advice on 2 similar schemes ([PRE/2016/0121](#)) produced the following from Haringey's planning department "*However, turning to the schemes which were actually presented at the pre-application meeting, these proposals would be unacceptable and [substantive reasons were given]*"

Approval would create a precedent meaning that it would be difficult to object to similar proposals.

I know of no permissions granted to allow any blocks of 5 storeys or more within the Crouch End conservation area, except the consented scheme on the Town Hall site. This scheme was robustly justified on the grounds that it was an enabling development, to allow the restoration of the Town Hall. To permit a taller development now when the authority is of the opinion "[that the consented scheme does maximise the development capacity of the site](#)" would be to set an unacceptable precedent.

Local [infrastructure](#) is not adequate to service the proposed development.

This question is not adequately addressed in the generally inadequate Transport Assessment. This document includes a simple tick list to demonstrate that there is a school / GP within a specified distance of the proposed development. No attempt is made to assess what capacity there is in these facilities to accommodate the c500 new residents, plus hotel guests within these facilities. Such an assessment should be

carried out. All the anecdotal evidence suggests that both schools and GPs are at their limits of subscription.

All service vehicles to and from the development will be via an access road from Haringey Park, terminating in a loading bay which can hold a single vehicle. The [London Fire and Emergency Service has explicitly stated that the arrangements as proposed are not satisfactory](#)

Some Community Infrastructure Levy will arise from the proposed development, which appears to be in the order of £4m. The calculation does not seem to have been finalised. Haringey has a statutory duty to publish a 123 list, which today reads

2014/15-2018/19 Reg 123 Projects

Lordship Lane Recreation Ground improvements

Down Lane Park improvements

Bruce Castle Park improvements

4 Improved Greenway cycle & pedestrian routes

Alexandra Primary School Expansion

Welbourne Primary School Expansion

Bounds Green Primary School extension

None of these is in Crouch End. In theory some 15% of CIL should be spent locally, but there is no guarantee of this, in the light of Haringey's continuing need to focus on the East of the borough.

The proposal is a piecemeal development that would prevent proper development of the area. - not applicable

The proposal will have an economic impact, such as impacting on tourism or on small businesses.

It is proposed that the part of the building currently given over to office use (B1 use) be converted to a hotel (C1) use. The effect of this will be to displace some 75 businesses and their 130 employees from their place of work. This is inconsistent with policies of the Mayor of London and Haringey. In the words of Councillor Joe Goldberg, Cabinet Member for Economic Development, Social Inclusion and Sustainability, in the foreword to [Haringey's Economic Growth Strategy](#) " *We have been seen as a dormitory borough with insufficient focus on local job creation.*" To evict successful businesses and replace them with places where people sleep would run directly counter to Cllr Goldberg's ambitions . The strategy also contains the exhortation to create a more dynamic borough, by which it means (inter alia) - "*The profile of Haringey-based jobs changes so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly skilled sectors, such as sustainable technology, digital design and skilled/craft manufacturing*". The proposal as it stands would do precisely the opposite, replacing highly skilled professional and technical workers with catering and hotel staff.

The application requests material change of use across significant areas of the Town Hall (principally the East Wing and Link Block) from B1 business use to C1 hotel use.

1. [Policy DM40 of the Local Plan](#) stipulates conditions for the granting of change of use of non-designated employment land and floorspace, requiring the applicant to demonstrate that the site is no longer suitable or viable for the existing use. The policy clearly sets out the requirement for clear and robust evidence of an open and recent campaign to market the site covering a minimum continuous period of three years (also explanatory para 6.27). Though a mixed use development is

planned which includes community infrastructure, the policy requirements are not met in this application as no evidence for redundancy is presented.

2. The present use of the East Wing and Link Block is reported to include 70+ small businesses with a waiting list for work spaces. This appears to demonstrate that B1 use is in fact viable with a strong level of demand. Accordingly therefore we would expect a very strong presentation from the applicant to establish that the site is no longer suitable as per existing use class. (Note: [Policy SP8](#) and the [London Plan](#) seek to require consideration and support for the type of small business and open workspaces currently housed in the building).

3. The figures contained in the applicant's [Viability Assessment](#) include presentation of the costs and revenue from both hotel and office use. An evaluation of business type use and a comparison between hotel and office use are therefore possible and confirm that continued B1 use is entirely viable under current market conditions (*see footnote).

4. HTH is a listed building. Policy and good practice, as set out by Historic England, the NPPF, the London Plan, and Haringey's Local Plan (DM9) require that when new uses are found for historic assets that they provide for a viable and sustainable use going forward and that impact on the significance of the asset is limited. Changes of use are supported should the original or current use be declared non-viable. The change of use is not however evidenced.

5. In conclusion, although the proposed siting of a hotel within HTH is not an objectionable use of the building and appears to meet the requirements for a listed building, the case for change of use has not been proven. Business type use appears equally viable. Furthermore the large scale conversion of areas of the building to hotel guestrooms is not without risk (unlike simply fitting out the spaces for the current use). If the hotel fails to provide a long term future for the building, we are left with a white elephant.

Consequently,

- (a) without a clear demonstration or evidence of the need for a change of use, and,
- (b) with a presentation of figures by the applicant which appears to confirm that the existing use is viable,
 - a change of use to C1 should be refused.

(*Footnote:

Figures on office use and the comparison of value between office use and hotel use, as presented by the applicant in the Viability Assessment:

The applicant proposes a capitalised value for the hotel of £15,243,617

The capitalised value of office use for the same space would be £10,446,600

(estimated net internal area of the hotel at 23,000 sqft and a figure of £30/sqft for office use, capitalised at 6.50%)

= shortfall of £4.8m

The cost of construction of a hotel above and beyond that of simply providing a basic refurbishment appears to be in the order of £12.7m (by comparing construction costs in the benchmarking exercise).

The cost of shell and core refurbishment to office spaces in the East Wing is unlikely to be more than £2m.

= uplift of £10.7m

Therefore providing office space instead of hotel gives -

Cost saving of £10.7m minus revenue loss of £4.8m = increased profitability of £5.9m

In conclusion the applicant's own Viability Report appears to establish that the value of providing office space on the site is actually greater than that of a hotel.)

This loss of employment space in Crouch End is an increasing problem, other developments include:

- The Kwik Fit site currently under consideration from which a thriving car repair business with an apprentice scheme will probably be evicted
- The former petrol filling station and car wash site adjacent to the Arthouse which is now under construction as a block of flats, which in turn seems to have stalled
- Offices in Edison Road which are now dwellings
- The Lynton Road site, currently a thriving business park, scheduled as a mixed use development.

The proposal will have [environmental health](#) impacts such as the use of hazardous [materials](#) or ground contamination. - I have found no evidence of this in the application.

The proposed development will impact on [listed buildings](#) or a [conservation area](#).

Please reject the Hornsey Town Hall planning application ref HGY/2017/2220 on the grounds that the changes that are being proposed will detract from the setting of an important complex of listed buildings, thereby diminishing the standing of both buildings, and removing the opportunity for future improvements.

[Government guidance](#) - Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework's drive to achieve sustainable development (as defined in [paragraphs 6-10](#)). The appropriate conservation of heritage assets forms one of the 'Core Planning Principles' ([paragraph 17](#) bullet 10) that underpin the planning system. This is expanded upon principally in [paragraphs 126-141](#) but policies giving effect to this objective appear elsewhere in the National Planning Policy Framework.

Hornsey Town Hall (grade II*) and Hornsey Library (Grade II) together form a complex of special architectural interest in the very centre of Crouch End. It is a site which is capable of improvement, to show off better these two buildings, but as it stands is nevertheless an interesting campus.

The proposed buildings will reduce our ability to enjoy these gems.

- 1) Filling in the spaces between them will remove the opportunity to circulate between the buildings
- 2) views of the buildings are already limited. The proposed buildings will limit views still further, especially at close range
- 3) the proposed buildings are unexceptional 21st century blocks which do not add to the architectural merit of the site

4) the proposed buildings are sited in [a conservation area](#), but can not be considered of sufficient merit to make a positive contribution to it

5) In order to build the new blocks it is necessary to demolish 'the clinic', a building which is of architectural merit and makes a positive contribution to the group of municipal buildings in this part of the conservation area. Listed building consent is needed to demolish the clinic, but should not be granted. [Paragraph 9 of the guidance](#) specifically states

" Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including []

replacing poor design with better design

[]"

It cannot be argued that demolishing the clinic achieves this.

6. I would refer you to the images submitted in support of an [objection by Stephen Richter](#) which attempt to show the true visual impact of the proposed buildings on the context of the TownHall / Library complex, and on the conservation area. This contrasts with the images submitted by the applicant which do not show the full scale of the visual impact, as they have chosen to leave in place in their illustrations large mature trees which will be felled in the course of construction. They have also chosen to illustrate the views when trees are in full leaf, which tends to conceal the full visual impact for much of the year. Many of the 'verified views' have been consciously chosen to be from vantage points from where one cannot anyway see the Town Hall. This is silly and this exercise should be re-run before permission is even considered
7. Verified views. In the [Design and Access statement part 10](#) the applicant purports to demonstrate that the proposed development will not detract from the context of the listed buildings. The views have largely been chosen to obscure the true effect of the development.
 1. View 1 has been selected so that the Town Hall is obscured by trees in full leaf and offers no useful information.
 2. View 2 has been chosen from a vantage point close to the library so that little can be seen of any of the proposed development. This view also contains trees in full leaf further to obscure the view. Stephen Richter has supplied views which suggest that the red dotted lines in View 2 underestimate the true effect. One of the sets of dotted lines is drawn through a pair of trees which will be removed,
 3. View 3 does begin to give some indication of the overbearing nature of the development , the canyon-like gap between the new buildings, and the overall effect on the conservation area.
 4. It beggars belief that View 4 (A and B) be offered as serious evidence in relation to this application. Please see alternative views of the Town Hall from Alexandra Park elsewhere in this submission
 5. View 5 appears not to be a view of the Town Hall
 6. View 6 also chooses trees in full leaf to obscure what the effect might be
 7. View 7 seems to have been omitted
 8. View 8 might do quite nicely in a travelogue for Crouch End, but tells us nothing of the proposed development.

8) I would also offer images of the Town Hall taken from Alexandra Park. These show very clearly the tower in splendid isolation. At night it stands out like a beacon, having been floodlit by the

current operators of the building. By day it stands against the backdrop of St Paul's Cathedral. Both of these important views would be diminished by the presence of tower blocks.



The layout and density of the proposed development is inappropriate.

The developers have included the Town Hall Square as part of the site area when calculating density, thereby increasing the available site area and thus reducing the actual density. The square should not be included in the overall site area for this calculation; it is a public space, dedicated to Community, specifically excluded from being built upon. The figure given by the developer is 162 dwellings per hectare, within the range for this area (which has a PTAL rating of 2/3). The true figure is 187 dwellings per hectare, which is outside the recommended range of 45 – 175.

The layout of the Square is inappropriate. This area has for some years been used as the location of the Crouch End Festival. The proposed raised flower beds, and eccentrically shaped green militate against this. The presence of very many cycle racks along the edges of the square imply the presence of very many bicycles, which are not shown in diagrams. The number of cycle racks referred to in the Transport Assessment for the square is stated as 'not less than 60'. Many fewer than this are shown in the illustrations of the green. Perhaps some of them have the capacity to hold more than one bike. This is not clear. The additional Food and Beverage outlets are all shown as having outside tables and chairs, which will tend to impede both foot and bicycle traffic. There will be staff waiting at these outside tables, using parts of the square beyond the tables.

The illustration of the square shows a market in place. Given the coming and going of pedestrian and bicycle traffic, and the space occupied by bicycles (not shown in the illustrative diagrams) the illustration is hugely optimistic. I do not believe the square as proposed will support the activities for which it is proposed it be used.

No provision has been made anywhere for servicing the proposed market stalls by motor vehicle. Hatherley Gardens and the turning circle are specifically excluded, being reserved for disabled access only. The rear of the Town Hall is set aside for a single large vehicle at any one time, and anyway the carrying to and fro of goods through the public spaces would be inappropriate.

The proposal is an inappropriate development within a [green belt](#). - Not applicable

Proposed advertising creates visual clutter.

This is a question which the developer has failed to address. It may well be that advertising and signage will detract further from the context of the listed building, will damage the public realm and create a bad impression. The Design and Access statement contains no images showing just how the increased Food and Beverage offering in the square will be advertised, nor is there any indication of how the presence of the hotel will be advertised. The visual and actual clutter in the square will be great. In addition to the very many pavement tables and chairs, there will be a very large number of cycle racks, it is intended to be a public garden filled with visitors, there will be waiting staff coming and going to serve the tables, bicycle users will be riding (pushing?) bicycles across the square. If ever there is a day when an event takes place inside the building and a market or festival takes place outside, such as happened last year during the Crouch End Festival, the square will not cope with the volume of traffic.

The proposed development includes insufficient landscaping.

The proposed development contains quite a lot of landscaping.

I have argued elsewhere that the treatment of the square is optimistic and unworkable.

The other elements of landscaping are situated in canyon like gaps between tall buildings and in courtyards. These areas are also used to facilitate 'permeability'. That is they carry traffic. I fear this may not be successful and is a further reason to reduce the scale of development proposed.

The proposed development will demolish or adversely affect an ancient monument or site of cultural or [architectural value](#).

I have argued elsewhere that the demolition of 'The Clinic' is inappropriate, and the very presence of tower blocks on this campus of considerable architectural merit will detract from the overall setting.

The proposed development will damage the natural environment or will result in significant loss of trees or the loss of trees for which [tree protection orders](#) are in place.

This is an urban development in an urban setting. As far as is known there will be no damage to the natural environment. Some trees will be lost, but the developer has undertaken to plant more. Some trees planted after public subscription are scheduled for relocation. I have no complaint on this heading.

The cumulative impact of the development when considered alongside other development will have an adverse impact on the area.

A considerable number of proposals are being put forward for consideration in Crouch End, and it is a feature of many of them that they involve buildings of five storeys or more. Generally those outside the conservation area are gaining permission. Given that many of these are on the very edge of the conservation area, the village nature of Crouch End is changing. This proposal should be refused in its present form as the cumulative effect will be detrimental.

There is inadequate access for [people with disabilities](#).

The developer has addressed the question of disabled access.

[Archaeological](#) issues.

There will be archaeological investigations

The type of housing proposed will not satisfy local housing needs.

Local, London and National policies demand that any new development make provision for affordable housing. None is proposed for this site.

The developer is based in Hong Kong and states on its web site that it is in pursuit of the “Chinese Wallet”. The developer has recently begun marketing its Manchester development to Chinese investors. It is perfectly possible that such marketing will also take place for this development. If much of the development is sold for overseas investment then it is likely that local needs will not be addressed at all.

Ideally the site should be devoted to dwellings aimed at:

- affordability
- downsizing units for retired or 'empty nest' householders
- housing association property

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Adrian Essex