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Paul Smith Head of Development Management Planning and Regeneration 639 High Road N17 8BD

Dear Paul



HORNSEY TOWN HALL APPLICATION REF: HGY/2010/0500

Having spent 22 years working in the Hornsey Town Hall and the Annexe I feel that I must express my concern at the proposals that are the subject of the present planning application.

Generally I welcome proposals to retain the Town Hall. It is a magnificent building now listed Grade 11* and all efforts should be made to preserve it. It is however important that in allowing 'enabling development' that the integrity of the building and its setting are not comprised. You will of course be aware of the duty imposed by the Planning (Listed Buildings and Conservation Areas) Act 1990 requiring the planning authority to have special regard to the desirability of preserving a listed building or its setting. In my view the present proposals do neither of these things. The proposed extension for residential accommodation attached to the south side of the Town Hall is higher than the existing building and is of a design which is completely different from the existing and is unsympathetic to its character. It would be a completely discordant element and would have a deleterious effect on the rear of the Town Hall. Although this elevation is not immediately evident from a public viewpoint, it is nevertheless carefully designed and, with the glazed staircase, it is an important example of thirties design which would be completely unbalanced architecturally by the new south wing.

Turning to the setting of the building, paragraph 115 of the recently issued Historic Environment Planning Practice Guide issued by English Heritage in association with the new Historic Heritage Guidance PPS 5 acknowledges that the setting of a building is generally more extensive than its curtilage. This clearly indicates that the site should be looked at as a whole. In the same context the above mentioned PPS 5 sets out as Policy HE 11 guidance on enabling development. This sets out a number of criteria: the first test is would the development materially harm the heritage asset or its setting? In my submission the proposed extension to the Town Hall and the four five and six storey blocks on the eastern boundary would cause material harm to the

setting of the building. The second relates to avoiding the detrimental fragmentation of management which as far as I can see has not been fully dealt with in this case. There might be conflict between the residential users and the users of the communal facilities particularly in respect of car parking and service access. This would be particularly important if the hall is to be used for concerts or similar activities. The third criterion relates to securing the asset's long term future and its continued use for a purpose sympathetic to its conservation. Only part of the building would be used for such purposes and a major wing will be gutted and transformed into residential flats. Other criteria relate to funding and I have not seen enough evidence to comment on this aspect but the final criterion is that the level of development should be the minimum necessary to secure the future conservation of the asset and of a design and type that minimises harm to other public interests. Again I have seen no evidence that this criterion is met.

The last point leads on to the consideration of the Conservation aspect of the proposal. The site is at the centre of the Crouch End Conservation Area. Again in accordance with Section 72 of the above mentioned Act the planning authority is required to pay special attention to the desirability of preserving or enhancing the character or appearance of the area. In my opinion the proposed buildings by reason of their height, scale and design would seriously mar the appearance of the area. When viewed from Haringey Park the end of the blocks of flats appears completely out of scale with the surrounding development. From this aspect the building looms over the locally listed building in Haringey Park. Regardless of the listed building issues it cannot be seriously argued that the proposals will preserve or enhance the Conservation Area. Further the proposals will cause harm to other public interests particularly as the car parking provision is in my view inadequate for the type of high cost residential units that it is hoped to build on the site. It is completely unrealistic to expect that buyers of expensive flats will not wish to have a car and any excess demand will lead to increased demand for parking on the already overcrowded streets.

My final point relates to the effect that the proposed new development will have on the daylight received by the existing buildings to the east of the site. In accordance with normal planning practice the daylighting aspects should be considered in the light of the advice in 'Sunlight and Daylight' published by the Department of the Environment in 1971 (Paragraph 3.10) and the BRE Information Paper IP5/92 of March 1992 which under the heading 'Adjoining Development Land' states: 'A well designed building will stand a reasonable distance back from its boundaries, to enable future developments to enjoy similar access to daylight.' Figure 5 of that paper and the D of E document show an angular criterion for overshadowing. The proposed blocks on the eastern boundary do not comply with this criterion and would prevent any future redevelopment of the adjoining site. The report accompanying the application accepts that there will be some diminution of the daylight received by certain properties. However, the way in which the exercise to

examine the effect of the proposed development on the daylight of adjoining property is carried out predicates that the buildings to the east of the site will remain in their present form for the life of the buildings now proposed. Is this assumption valid and is it right to prejudice the future interests of the adjoining landowners in this way without their agreement?

The present proposals differ considerably from anything that has previously been the subject of public consultation. Great detail, almost to working drawing stage, is shown in the current application which has been produced at a very considerable expenditure in fees. I would have expected, that been taken to establish fundamental principles of siting and mass of the new buildings.

Yours sincerely

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David Frith