



# PARKSIDE MALVERN RESIDENTS ASSOCIATION

Alexandra Road, Hornsey Park Road, Malvern Road, Park Ridings, Ravenstone Road  
and The Avenue, N8 - [www.PMRA.co.uk](http://www.PMRA.co.uk)

(Reply by email to [parksidemalvernra@googlemail.com](mailto:parksidemalvernra@googlemail.com) or by post c/o 137 Hornsey Park Road, N8)

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Head of Development Management and Planning Enforcement  
Haringey Council  
6<sup>th</sup> Floor, River Park House  
225 High Road  
Wood Green  
London, N22 8HQ

Attn. of Adam Flynn

Our reference: consultation letter 1

15<sup>th</sup> November, 2017

Dear Madam,

## **Re: HGY/2017/2886 - Consultation Response to proposed development of Iceland site**

I write on behalf of Parkside Malvern Residents Association (PMRA), the registered residents association covering Hornsey Park Road, Alexandra Road, Park Ridings, Malvern Road, Ravenstone Road and The Avenue, N8 in response to the Council's consultation letter. The views expressed in this letter are those of the Committee and the membership.

We would like to register the strongest possible objection to the proposed development as detailed below. The wider membership will also have individual concerns which, while not covered by this letter will have been communicated to you directly.

### **1. Principle of the development**

- 1.1 The site combines land in the Site Allocations/AAP (site SA WG 11) with land in the residential neighbourhood of Hornsey Park whose character is almost entirely two storey Victorian terraces. The applicant has wrongly taken this as agreement to extend Site SA WG 11 and its associated intensification into the residential neighbourhood outside the AAP area. The proposal is therefore applying policies relating to the Site Allocations/AAP and town centre development to the residential neighbourhood to the detriment of the Hornsey Park Road neighbourhood and its community.
- 1.2 With the Government's effective cancelling of Crossrail 2 and the Mayor's failure to find any alternative mechanism to procure its delivery, the basis on which the AAP Preferred Option is predicated and all consultation and conclusions relating to intensification and the scale of development is invalid. Accordingly, the AAP proposals and assumptions no longer stand and cannot be cited as evidence to support development that is already unacceptable for other reasons (e.g. harmful impact on neighbouring development, failure to provide open space in an area of open space deficiency and failure to respect the Blue Ribbon and open the Moselle Brook).
- 1.3 The development is contrary to NPPF, London Plan 2015 Policies 3.5, 7.4 and 7.6, Local Plan 2013 Policy SP11 and Policy DM1 of the Pre-Submission Version of the Development

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Management DPD January 2016, which identify that all development proposals should respect their surroundings by being sympathetic to their form, scale, materials and architectural detail.

- 1.4 The development is unacceptable and contrary to policy because it will result in a loss of employment of 30 from the site as well as having a wider impact on jobs and the local economy as the proposed GP practitioners are to be relocated from other parts of the area together while local pharmacy services will find themselves in competition with the new pharmacy that will undoubtedly be located in the development. We would refer you to Fig. 6.2 - Map of Infrastructure Improvements in the AAP Preferred Option which omits Morum House, Bounds Green Road as a healthcare facility in the AAP area, from which we must conclude any healthcare jobs being created as part of the development are in fact a reprovision of existing jobs.
- 1.5 No serious or professional attempt has been made to establish the feasibility of opening up the Moselle Brook, contrary to the AAP Preferred Option, policy SD5, the London Plan and the requirements of the Environment Agency.
- 1.6 With encouragement from Haringey, the applicant has failed to engage with local groups who are actively supporting and seeking to procure the opening up of the Moselle Brook together with the long-term sustainability of water quality and biodiversity through the site and across the area of the AAP Preferred Option. This failure, together with the forgoing point about failing to investigate the feasibility of opening up the brook is contrary to central Government guidance on engagement with local communities and seeking to use the planning system to bring forward high quality development.
- 1.7 At 15 units (or 9% of homes to be developed) there is a complete failure to provide the level of affordable housing required under both Haringey and policy 3.11 of the London Plan.
- 1.8 The application has been brought forward and the phasing proposed in support of a healthcare use for which there is no Needs Assessment nor NHS approval for funding or commitment to provide NHS services to the neighbourhood. We are also aware that there is valid extant planning permission for healthcare facilities on the adjoining Heartlands site. We have asked by way of FOI request for confirmation from the CCG that, 1) their STP includes this proposal, 2) that NHS England has agreed to fund it and, 3) that there is a practice of GP practitioners committed to provide NHS general medical services from this location. To date, the CCG has not been able to provide any assurance.

You will also be aware that the GP health centre in the planning permission for New River Village (originally part of the Haringey Heartlands) was never provided precisely because the local health commissioners (the PCT as forerunners of the CCG) had no legal responsibility to support the developer (Berkeley Homes/St. James) in meeting a S.106 planning obligation to provide healthcare facilities. In the absence of agreement from NHS and a legally binding agreement upon the proposed GP practitioners, there is no case to grant the D1 use.

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## 2. Design and Appearance

- 2.1 There is no justification for or policy supporting the height of this development. The Site Allocations DPD - January 2014 proposed restricting development to 5 to 6 storeys. The document also proposed, together the sites opposite (referred to as Bitten Place) the provision of public open space for recreation and children's play, in addition to the usual private amenity space requirements for residential development: none of this is provided by the proposed development. Option 4 of the recent draft AAP "Spatial Vision and Strategic Objectives" also proposed development of 4 to 6 storeys. While no heights are mentioned in the AAP Preferred Option currently under review following public consultation, all consultation, quantitative and qualitative measures have referred to building heights not exceeding 5 to 6 storeys: we object to an omission from the AAP Preferred Option, which is not even adopted, to justify inappropriate and harmful height and mass.
- 2.2 The development is significantly more intensive than that consulted on in the AAP Preferred Option. We object to the net increase of 49 dwellings which, using the percentages of one bed, two bed and studio units in the application, adds more than 5,000sqm to the development. While this is balanced by a reduction in non-residential floor space of 1,406sqm, the unjustified net increase of 3,600sqm of residential floor space is gross over development which has contributed to the adverse impact on neighbouring properties, deficiency of open space and encroachment on the Blue Ribbon.
- 2.3 Development will have an adverse impact on the visual amenity of the area by reason of its height, massing against Brook Road and Mayes Road, the dominant effect of the tunnel vehicular access on Brook Road, failure to respect and respond to the Heartlands development and proposed two phased delivery, all contrary to Policies 4.7, 7.4 and 7.6 of the London Plan 2016, Policy SP11 of the Haringey Local Plan 2013, Saved Policy UD3 of the Haringey Unitary Development Plan 2006, and Policy DM1 of the Pre-Submission Version of the Development Management DPD January 2016.
- 2.4 By reason of its excessive height, lack of contribution to a high quality public realm and loss of trees the development would have an adverse impact on the visual amenity of the streetscene and the appearance of the area generally and as such, the proposal is contrary to the forgoing Policies.
- 2.5 By reason of its inappropriate development of the Blue Ribbon and failure to restore the Moselle Brook and associated loss of open space in the fenced area between the back gardens of Hornsey Park Road and the Iceland car park, the development is contrary to the objectives of the Local Plan and would prejudice the ability of the Council to realise the aspirations for Wood Green in the AAP to improve the town centre, create links through the area (at least from the railway to the west as far as Mayes Road and The Mall), provide open space in an area of open space deficiency and intensification and enhance biodiversity by protecting a valuable natural habitat. As such, the proposal is contrary to Policy 2.15 of the London Plan 2016, Policies SP0 and SP10 of the Haringey Local Plan 2013, Policies DM1, DM3 and DM41 of the Development

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Management DPD Pre-Submission Version 2016, the Site Allocations DPD Pre-Submission Version 2016 (with Modifications), and the Wood Green AAP Preferred Options 2017.

- 2.6 We object to any regard being had to advice provided by the Haringey Design Panel when such advice was sought and has been given based on incorrect and an incomplete understanding of planning policy, the character of the site and the sensitivity of the adjoining residential neighbourhood to major development (a sensitivity referred to in planning policy).

### 3. Impact on the amenity of adjoining occupiers

- 3.1 By reason of height, overall linear scale, raised podium, rear parking and massing on the boundary, the development would have an adverse impact on and cause harm to the residential amenity of homes in Hornsey Park Road, typically two storey Victorian houses (the retention of which is a policy objective), through loss of light and privacy, noise, overlooking and reliance on an informal tree screen and planting in adjoining back gardens beyond the site. Such planting beyond the site should not be relied upon to hide or provide privacy from inappropriate and harmful development: the development is contrary to UDP Policy UD3, London Plan Policy 7.6, and Policy DM1 of the Pre-Submission Version of the Development Management DPD January 2016.

### 4. Transportation

- 4.1 Despite its PTAL rating of 4, the development is not accessible from the High Road and the east side of Noel Park nor good for buses or tube/ railway other than by back roads and poorly designed back land footpaths. These paths, Caxton Path and Martins Walk have no active frontages, are poorly managed and regarded as unsafe to use by many at quieter times of the day. Health centres are notoriously difficult from a parking perspective with the health professionals demanding a parking space along with older people and those with mobility problems.
- 4.2 The proposed health centre, retail development and residential use will give rise to excessive levels of traffic and demand for parking for which no provision is being made. The development is located in the 'Wood Green Outer' CPZ where the operating hours are limited to Monday to Saturday from 08:00 to 18:30 and as such the proposed development will result in uncontrolled demand for parking and high levels of traffic outside these hours as well as in and immediately adjacent to the town centre Inner Zone and residential neighbourhood of Hornsey Park (where the CPZ operates seven days per week, 8am – 10pm). The Hornsey Park area already suffers from excessive levels of traffic and illegal parking, including high levels of 'blue badge' parking on yellow lines causing inconvenience, congestion and poor air quality as well as safety being subject to a number of significant safety concerns.

### 5. Trees and Landscaping

- 5.1 The development will result in the loss of valuable open space on the corner of Mayes Road and Brook Road together with the loss of a number of mature trees of significant visual value.

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5.2 The development is provided with insufficient amenity space in an area of open space deficiency. The proposed podium is an inappropriate substitution for open space and amenity and will have an adverse impact on and detract from the amenity of the adjoining back gardens in Hornsey Park Road.

5.3 The development results in the loss of a valuable natural habitat in the area of the Blue Ribbon and fails to support nature and biodiversity at the rear of gardens to Hornsey Park Road.

## 6. Waste

6.1 The development fails to provide adequate space to manage the storage and servicing of the large amount of commercial, clinical and domestic waste (secure, recyclable and waste for incineration/landfill) that will arise: servicing from the active frontage on Brook Road across the street will give rise to a hazard to pedestrians and cyclists, cause traffic congestion, dirt and detract from the public realm, contrary to policy. Development should be serviced on site, away from site boundaries and the adjoining residential neighbourhood.

## 7. Air quality

7.1 By reason of the level of traffic and traffic congestion the development will cause in an area of exceptionally poor air quality, the development will be injurious to the health of those living in Hornsey Park Road and the near vicinity.

7.2 No air quality and dispersion modelling has been undertaken to establish that the proposed development, unconnected to the proposed district energy network, will not in combination with the proposed height and density of adjoining development have an adverse impact on air quality on the surrounding neighbourhood.

## 8. Drainage

8.1 The development fails to deliver SuDS in accordance with policy, choosing instead to treat the Moselle Brook as a drain. This is not acceptable for a 21st century development in the heart of Wood Green where policy requires drainage and water management to retain water on site so far as reasonably practicable in association with biodiversity, landscaping and amenity space and recreation. Less intensive development respecting the Blue Ribbon and established site features would deliver these drainage policies.

## 9. Planning obligations

9.1 The development fails to provide sufficient open space, linear connection through the area, contribution to the public realm, on-site parking, access to and enhancement of the Blue Ribbon and as such should be subject to significant contribution through S.106. Notwithstanding the forgoing objections, the development is unacceptable in the absence of such contribution for defined works to address these deficiencies. Your attention is drawn to the recent refusal to grant planning permission for the Aldi site opposite the development as an informative.

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## 10. Legal obligation of Haringey to determine

10.1 We do not believe the application to be complete and therefore properly validated and consulted on. The land on and across which the Moselle culvert runs is not, we understand in the freehold ownership of either the applicant or the Haringey. We have asked through FOI for confirmation that the land on the south side of the brook is in the control of the applicant or Haringey. It is not part of Site SA WG 11 under the AAP nor is it part of the Iceland site. We very much regret that Haringey (corporate) has obstructed our perfectly reasonable request for clarity on ownership and can therefore only assume the council does not have good title. Accordingly, in the absence of the correct notice being served, the application is incomplete and should not have been registered.

## 11. Conclusions

We believe the proposal to be a bad development that will cause significant harm to the area and set an unacceptable precedent for other development. It is an indictment of Haringey that a site which it owns and has worked so hard to bring forward for development should have been planned so totally at odds with policy and to the detriment of neighbours, jobs and the local community. The community of Hornsey Park and Wood Green requires development on this site to set an unimpeachable standard in terms of design, restoring the Moselle Brook, access to the Blue Ribbon, open space, biodiversity, public realm, affordable homes and sustainable transport. Redevelopment of the site as proposed is unacceptable at the strategic level and in its detail, is contrary to policies and Haringey's own guidance for the site and surrounding area, will have an adverse impact on the visual amenity of the area and have an adverse impact on homes adjoining the site and the neighbouring residential community.

Yours faithfully

*Polly de Boer*

Polly de Boer – Association Secretary,

For and on behalf of Parkside Malvern Residents Association

Cc Ryan Burton King and Marcus Ballard - Co Chairs, PMRA

- + Lyn Garner, Emma Williamson, Directorate of Regeneration, Planning and Development
- + Jeanelle de Gruchy, Director of Public Health
- + Cllrs Ahmet, Mann, Strickland, Goldberg & Kober