

The Planning Service
Haringey Council

By email: planningsupport@haringey.gov.uk

Our ref: db/4hf03/0039

Your ref:

DDI: 0117 314 5382

Doc no: 29841951v1

22 November 2023

Dear Sirs

Planning Application ref: HGY/2023/2701 (the "Application")

We act for Heartlands Academy which is immediately adjacent to the Application site and shares the entire length of the western boundary of Wood Green Common.

The Academy objects to the proposed development on the following grounds:

Heritage

The Design and Access Statement ("**DAS**") indicates at para 2.1 that the development is adjacent to a statutory listed structure (the wall on the boundary between the Academy and the Common) and lies within a local listed park.

The Application does not carry out the assessment required by para 194 onwards of the NPPF as to the significance of those assets, the contribution made by their setting and the effect of the development.

The Policy Context section of the DAS references section 2.4 (*sic*) for how it responds to the historic context. The corresponding section appears to be section 2.1 which gives a description of the history of the site by old maps and photos but there is no analysis whatsoever as to how the development responds to that history, the significance of that history or the importance of what is left after modern development. There is no discussion of analysis within the DAS of the harms that the development may cause to the wall and the park. Strategic Policy SP10 requires development to: "Conserve the historic significance of the borough's designated historic parks and gardens." If there is no understanding of what is significant, how can the Application address this?

The commentary in the Heritage Context section of the DAS is limited to noting that it lies within the conservation area. The conservation area character appraisal states:

"4.33 Wood Green Common occupies a large area to the south of Station Road and provides the conservation area with its characteristic sense of openness. The Common is divided into two constituent areas, the open green space at its western end and the well planted landscaped gardens to the east....

4.34 The western section of the Common forms a large expanse of grassed open parkland that is lined on its northern side by a row of mature London Plane trees. It is bounded to the south and west by a magnificent classically detailed tall red brick wall that follows a beautifully swept arc

delineating the New River Path. The wall is gently swept to follow the contours of the land and is well articulated in a long continuous series of brick panels with plinths and terracotta copings set between piers with terracotta caps. It successfully encloses the views across the common from Station Road and is considered to be a major positive contributor to the character and appearance of this part of the conservation area. A relatively well maintained play area has a neutral impact on the character of the open space at the western end of this section of the Common."

It is clear from this that the defining characteristic of the western half of Wood Green Common is the openness as a large expanse of grassed parkland. Of equal importance is the views of the wall from Station Road. There is no acknowledgement in the DAS of the effect on these characteristics. There is obviously a negative impact on these characteristics by the development.

Loss of use of open space

Wood Green Common is an important open space for the use of the local community. This is acknowledged in the DAS. It describes the area as part of a number of unenclosed linear commons. However, one of the main features of the proposed development is a large, 3m high fence which would be significantly detrimental to both the perception of and use of the open space.

The Academy uses Wood Green Common in the summer months, by agreement with the Council, for activities for its pupils. With a significant proportion of the common built upon and enclosed by this development, the Academy considers this would no longer be possible for its purposes.

The loss of space for this use for the community's school age children should at least be acknowledged by the Application and the detriment that the development will cause in this regard should be taken into account in the planning decision.

In the discussion regarding Policy DM20 (p4 of the DAS), it is stated that the development meets the requirements of DM20 and also there is no net loss of open space. The DAS doesn't explain *how* the development meets these requirements. There is no discussion or analysis as to the effect of the enclosure of the MUGA by a 3m fence on the usable open space for the public and the perception of the loss of space by the fence.

Section 3 of the DAS states that Wood Green Common is a "small open space". The Haringey Heartlands Development Framework states of Wood Green Common that it is the only 'key open space' in the Haringey Heartlands Action Area. One of the "Objectives" is "to protect and enhance Wood Green Common for the enjoyment of the community in partnership with the Guardians of Wood Green Common Residents Association and which protects its status as a 'Town Green'".

There is no discussion in the DAS, beyond acknowledging that it is a Town Green, that by fencing off part of the common, this may have an effect on the protections afforded by town green status. As the only significant open space in the Haringey Heartlands Action Area, Wood Green Common ought to be afforded greater protection against development.

The DAS states that the amenity value of the Common is low. This overlooks the importance of open space for use by the public (including the Academy for activities) and the benefit of open views across it. With the scale of the development, it would arguably cease to be a 'common' in nature.

The DAS has very little text addressing the operation of the MUGA save mention of "smart access" at the end. It is assumed therefore that with floodlighting as well, that access will not be freely available to the public but will require booking and presumably payment. These issues have not been discussed as to the effect they will have on the open space.

Anti-social behaviour

Policy DM2 is addressed on p4 of the DAS. The conclusion is reached that the development addresses anti-social behaviour, there is natural surveillance and opportunities for interaction. There is no discussion in the DAS as to what elements of the proposed development contribute to these conclusions. What differentiates this scheme from a poorly designed or located scheme where the MUGA just leads to gatherings, particularly after dark, leading to anti-social behaviour?

There is nothing in the maintenance and operations section, or the design elements, of the DAS to suggest that specific actions have been or will be taken to make this development safe.

This element is of particular importance to the Academy owing to its duty of care to its pupils and the need to work towards a safe location for the school in the surrounding area.

Alternative Sites

There is no mention in the DAS of any consideration of alternative sites. This is important given the likely harms to the heritage of the locally listed park and the statutory listed wall.

Environment

The section on the effect of the environment appears to be missing. Indeed there appears to be an internal note left on p4 of the DAS stating "WILL NEED UPDATING ONCE WE HAVE THE LIGHTING DETAILS". It then concludes that the development meets policy DM23 anyway.

There is no discussion in section 3.10 of the DAS of how the development meets that conclusion. Furthermore there is no indication that there has been any consideration of the wildlife on the common and the effect that the lighting may have.

Policy DM23 requires "Development proposals that include external lighting must mitigate potential adverse impacts from such lighting". There is no demonstration in the Application that there may be harms from lighting (which is acknowledged by the Local Plan) and no mitigation therefore is even considered.

Conclusion

For non-compliance with the NPPF on the conservation of the historic environment alone, the Application ought to be refused. Nonetheless, the Academy also objects on the above grounds and would welcome a discussion with the Council as how the provision of a MUGA in the locality could be better achieved.

Yours faithfully

A handwritten signature in black ink, reading 'Veale Wasbrough Vizards' in a cursive style.

Veale Wasbrough Vizards LLP