

Highgate CAAC objection to HGY/2023/1851 for 222 Archway Road, N6 5AX

Change of use of the basement and ground floors levels from offices (Use Class E) to residential (Use Class C3) with associated external works

Highgate Conservation Area Advisory Committee objects to this application for a number of reasons.

1. This is the latest in a series of applications to convert the former commercial premises at 222 Archway Road into residential.

In their noise report prepared for HGY/2021/2307, file "22515.NIA.02", KP Acoustics Ltd said:

"As changes to the external façade are not permitted under Permitted Development rights, we would recommend that a secondary glazing system is installed to enhance the current performance, as follows:"

However, in the current application an entirely new "shop front" will be installed which will no longer feature a door into the premises, with sole access from Archway Road being via the side corridor shared with other flats in the building.

Are there restrictions on the external appearance of such PD conversions in Haringey or in Haringey's conservation areas which would continue to apply? The case officer should carefully check whether the current application is compliant with PD requirements for shops converted into residential in this regard.

2. The new permitted development rights are far clearer on the following:

- *Every habitable room in the residential conversion must receive natural light.*
- *All flats or houses must meet minimum space standards.*

Also the proposals must meet the standards set in the London Plan.

However, the kitchen/dining room is entirely internal with double (presumably glazed) double doors to the living room and the daylight and sunlight study does not evaluate the kitchen/dining room, only the living room, as R3.

In addition, it is not clear that the room sizes meet the requirements of the NPPF and London Plan.

The case officer should carefully evaluate whether the light and daylight study presents evidence which makes the case for these proposals meeting PD requirements, and whether the room sizes meet legal requirements.

Have any measurements taken into account the proposed alterations, e.g. would the addition of stall risers reduce the light reaching the basement?

3. A number of other aspects of the proposals remain as problematic as in the earlier applications HGY/2021/1508 and HGY/2021/2306 which were refused and the refusal of HGY/2021/1508 upheld at appeal.

The drawing “2102_00_200_Proposed_Basement_and_First_Floor_Plans-1.pdf” clearly shows three openable roof lights on the flat roof above the current shop front. These will allow noise and pollution into the bedrooms from the A1 Archway Road. We do not understand how this arrangement is compliant with legal requirements given what a very busy and polluted road the A1 is at all times of day.

In addition it is possible that residents of the upstairs flats will be able to see into the bedrooms via these roof lights.

There also appear to be A/C or ASHP units currently on the flat roof which might be a further source of noise. (See photos below.)

By contrast, there appears to be no ventilation to the proposed room(s) inside/below.

The case officer should carefully consider whether the new proposals meet ventilation, noise, pollution and privacy/overlooking requirements.

4. The only entrance/exit and means of escape at ground floor level is now via the corridor shared with other flats in the building. We are concerned that this will negatively affect the amenity of other residents, e.g. in terms of noise.

As was the case in the previous applications, the proposed cycle store appears to be open to the shared corridor, and might impede the means of escape of other residents of the building.

5. It is not clear that there is sufficient space allocated for refuse and recycling storage.

6. The drawings are very poorly labelled and the documents include misleading descriptions such as “the first floor” when the maisonette will be on the ground and basement levels. For instance,

“2102_00_200_Proposed_Basement_and_First_Floor_Plans.pdf” and

“2102_98_200_Existing_Basement_and_First_Floor_Plans.pdf” actually show the proposed basement and ground floor plans.

7. Some of the drawings do not appear to be accurate.

For instance, compare drawing “2102_00_210_Proposed_Front_Elevation.pdf” with photos taken on 17th August 2023 (below):





The application drawing above gives the impression that the shop front at No 222 is lower compared to neighbouring buildings than is the case in reality. The drawing of “The Sanctuary” and of the pillasters between frontages are particularly inaccurate. There is also an A/C or ASHP unit on the flat roof of No 222 which does not appear in the drawings.

Accurate drawings should be provided.

8. The application is generally deficient in that it provides no information on the impact of the proposal on the conservation area.

No. 222 forms part of a consistent late-Victorian shopping parade which is shown as

partly built on Stanford's map (1886) and was probably complete when the map was published. While No. 222 and most other shop fronts in the parade are modern and of no merit - No. 224, which has a complete early 20th century shop front, being a notable exception - the parade retains original pilasters with ornate scrolled consoles providing rhythm and consistency. It is also likely that original cornices survive beneath modern fascias. These are important features which should be retained when new shop fronts are installed.

The proposed elevation indicates that the consoles (and possibly the pilasters) flanking No. 222 would be removed, although this is not fully explicit. This would be a detrimental loss which would also affect the well-preserved shop front of No. 224.

9. In addition, the proposed obscured glass will give a 'dead' appearance to the street. If this were to set a precedent it would adversely affect the character of Archway Road as a vibrant commercial area.

The case officer should also consider whether the current proposals are consistent with Highgate Neighbourhood Plan:

HNP Policy EA3: Archway Road

Along the length of Archway Road (as described in Tables 1 and 3 and Fig 7) A1 (shops) and A3 (restaurants and cafes) uses will be promoted. Where planning permission is required, and where Haringey has designated a shopping frontage, a change of use from A1 or A3 to any other use within class A will be acceptable provided: I. The proposal would contribute to the vitality and viability of Archway Road or would provide regenerative improvements that enhance the character of the area; II. The overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire commercial core and; III. An active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage. A change of use to A1 or A3 uses will be actively encouraged, provided it does not result in the loss of an important community facility or conflicts with policy elsewhere in the development plan.

Summary

For all of the above reasons we believe that the applicants have still not successfully

answered numerous objections raised by the Highgate Society, ourselves and others in response to the earlier applications HGY/2021/1508 and HGY/2021/2306, and that this application will result in substandard accommodation and negatively impact residents of neighbouring flats.

We are not convinced that PDR requirements such as those on daylight, ventilation and change of shopfront have been met.

This application should be refused.