

F.A.O Cameron Sturges & Haringey Council Planning Department
Alexandria House
Station Road
Wood Green
N22 7TR

Friday 25th August 2023

Dear Cameron Sturges

R.E: HGY/2023/1851 – 222 Archway Road, London N6 5AX

Please accept this letter as our formal response to the Highgate CAAC objection letter uploaded to the Haringey Council application database in relation to application HGY/2023/1851 for 222 Archway Road, N6 5AX for Change of use of the basement and ground floors levels from offices (Use Class E) to residential (Use Class C3) with associated external works.

We will respond to each point in the order they have been raised by the objector to address their concerns.

To be clear and to reiterate our intention, we are going to proceed to develop 222 Archway Road by changing the use of the basement and the ground floor levels from offices (Use Class E) to residential (Use Class C3). We have an approved scheme via an appeal decision via ref: APP/Y5420/W/22/3294965 and Haringey Council reference HGY/2021/2307. This will be implemented if this application is refused. We therefore feel that the current application (HGY/2023/1851) further improves on the implementable scheme and therefore should be considered as an opportunity to provide a residential dwelling sensitively within the conservation area. This application is providing an improvement to the external façade from the current condition, and in relation to application HGY/2021/2307 which will be implemented, if this current application is refused. The current application is providing a sympathetic approach to an already approved scheme with the conservation area in mind.

Highgate CAAC Objection Point 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.

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PAPA Architects Response to Objection Point 1.

The current application is not a permitted development scheme and therefore permitted development requirements are not relevant to this application. The application HGY/2023/1851 is a full planning application. The new shopfront will meet the noise requirements set out in the accompanying noise report.

Highgate CAAC Objection Point 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?

PAPA Architects Response to Objection Point 2

The rooms all meet relevant space and BRE standards, as set out in the accompanying documents. Please note that the parameters of daylight and sunlight has been tested at Planning Inspectorate level and a planning refusal was overturned at appeal. A revised Daylight & Sunlight report has been provided which is in relation to the current proposed scheme with all passing BRE Requirements.

In relation to comment with regards to room sizes, NPPF and London Plan requirements, please find attached revised plans which show each individual habitable space with an associated area measure. These are all in accordance with London Plan, NPPF and even exceed minimum standards.

Highgate CAAC Objection Point 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.

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PAPA Architects Response to Objection Point 3

- The proposal shares issues with previous applications that were refused. **This scheme was appealed and allowed at appeal.**
- Three openable roof lights are shown in the drawings, posing potential noise and pollution problems from the busy A1 Archway Road. Questions the feasibility of this design on a highly trafficked and polluted road. **The application is accompanied by a noise report and glazing would be provided to ensure the scheme meets relevant acoustic standards. As stated in the report, an MVHR system can be implemented to deal with ventilation. Openable rooflights will provide the resident the choice on which ventilation option they decide to use. The primary living area has double doors opening out onto the tranquil garden for the property, on the opposite side of the building. This is a further improvement on the appealed approved scheme, as the external amenity space is now accessed via a living space as opposed to a bedroom.**
- The A/C or ASHP shown in the photos are existing and have been in place since 2001, these were also in place when the Noise Impact Assessment was undertaken.
- All rooms will have natural ventilation options and will have MVHR.

Highgate CAAC Objection Point 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.

PAPA Architects Response to Objection Point 4

- The single entrance/exit through a shared corridor could negatively affect neighbouring residents due to noise concerns. **It's common for flats to share communal areas.**
- Raises concerns about the proposed cycle store potentially obstructing escape routes. **The bike store is inset so it wouldn't block any escape routes.**

Highgate CAAC Objection Point 5

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

PAPA Architects Response to Objection Point 5

See attached revised plan with kitchen labelled to indicated integrated waste storage.

Highgate CAAC Objection Point 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.

PAPA Architects Response to Objection Point 6

Noted. These are minor typos on the drawing sheet. The correct plan is indicated correctly with the larger detail tag. The drawing title has been revised to correct the typo.

01 Proposed Ground Floor Plan
1:100@A3

02 Proposed Basement Plan
1:1@A3

Highgate CAAC Objection Point 7

Some of the drawings do not appear to be accurate.

For instance, compare drawing "2102_00_210_Proposed_Front_Elevation.pdf" with

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photos taken on 17th August 2023 (below):



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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.

PAPA Architects Response to Objection Point 7

The angle of the photographs provided have purposely been taken to avoid the upstand which is set back to No.224 from the front elevation at ground floor. Please find attached alternative photograph displaying this:-



The below diagram also shows the elevation line on both photo and elevational drawing. The drawing has been updated to show the details to the console and pilasters.



Highgate CAAC Objection Point 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.

PAPA Architects Response to Objection Point 8

The front elevation drawing has been updated to note that the Pilasters and Consoles are to be retained. The drawing has been further updated to include the detailing of the consoles. To be clear, these will be retained.

Highgate CAAC Objection Point 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.

PAPA Architects Response to Objection Point 9

The application is seeking to provide an upgraded shopfront to accommodate the proposed residential use as applied for in this application. The proposed shopfront will provide a more aesthetically pleasing shopfront which should be seen as a positive contribution to the conservation area.

Should this application be refused, the existing shopfront will remain, and a residential use will be implemented via application HGY/2021/2307. Please note that an opaque film can be applied to the existing windowpane internally which does not require planning permission and can be undertaken by a future resident should they choose.

Highgate CAAC Objection Summary Points

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.

PAPA Architects Response to Objection Summary Points

This application has sought to improve on an application which was granted at Appeal by The Appeal Inspectorate. To reiterate, the comments in relation to PD Requirements are not relevant as this is not a permitted development application. In addition, a new daylight & sunlight report has been provided which prove that the proposals all meet and in areas exceed BRE Guidance.

It should be noted that all the comments made have been addressed successfully through the appeal process and granted. Apart from obvious improvements such as the introduction of shopfronts, skylights, introduction to wider aperture to the rear elevation, reconfiguration of the internal layout to access the garden from a living space. We therefore believe the proposed scheme is a vast improvement on the current approved scheme and therefore should be granted. If the case officer deems necessary, the detailing of the shopfront can be included as part of a discharge of condition prior to carrying out that portion of works.

I trust that we have addressed the comments made by the Highgate CAAC and therefore the application should be approved.