

01.07.2026

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**RE: Applicant's Response to Late Representation and Summary of Planning Balance —
HGY/2026/1050**

Since this letter was submitted, the NPPF has been revised and the new national decision-making policies took effect on 17 August 2026. The planning balance set out below should therefore be read in the context of Policy S4, which provides that development proposals within settlements should be approved unless the benefits would be substantially outweighed by adverse effects.

Dear Eunice

I note that a late representation has been submitted by a ward councillor. As the applicant and architect I would like to respond to this and provide a summary of the planning balance, should any heritage effects be identified.

This application sits at the intersection of two important public policy objectives: the conservation of heritage assets and the transition towards a low-carbon built environment. Neither objective is secondary to the other. The planning system requires careful stewardship of historic places, but it also recognises that existing sites and buildings must respond to contemporary environmental challenges. Both imperatives carry statutory and policy weight and both must be given proper consideration in the planning balance.

The circumstances of this site are unusual and well documented. The existing dwelling is uninhabitable, subject to a Prohibition Order and incapable of meaningful repair or adaptation. The proposal seeks not merely to replace that building, but to demonstrate how a constrained urban site within a sensitive heritage setting can accommodate a high-quality, fossil-fuel-free home with exceptionally low operational energy demand. The replacement dwelling achieves zero regulated carbon emissions in accordance with Haringey Local Plan Policy SP4 and a predicted A-rated Energy Performance Certificate. Enhanced biodiversity, improved accessibility and the restoration of a long-term viable use for a site that has remained in an unacceptable condition for many years are further benefits that have informed the design from the outset.



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Building performance has been treated as a fundamental design consideration rather than an afterthought. Compliance with Parts L and O of the Building Regulations has influenced the building's form, orientation and elevational design from the earliest stages of development. Measures required to limit overheating and provide effective natural ventilation are inseparable from the building's appearance and layout. The proposal therefore responds not only to energy efficiency requirements but also to the increasingly important challenge of delivering dwellings that remain comfortable and resilient in a warmer climate, manifest in increasingly frequent and severe heat events of the kind being experienced across London and northern Europe.

National policy expressly recognises the importance of these objectives. Paragraph 164 of the National Planning Policy Framework (2024) requires significant weight to be given to the need to support energy efficiency improvements and low-carbon heating technologies, including heat pumps and solar generation. These are not peripheral considerations. They are material planning benefits of substance which must be weighed alongside any heritage considerations.

The proposal is also the product of a design-led optimisation process consistent with London Plan Policy D3. The objective of that policy is not to minimise development but to optimise site capacity through careful consideration of context, design quality, sustainability, accessibility, environmental performance and residential quality. The resulting form is therefore not the product of maximising floor space, but of reconciling these competing requirements on a tightly constrained site. The scale of the proposal reflects the minimum necessary to deliver a compliant, habitable, accessible and genuinely sustainable dwelling capable of meeting contemporary standards.

The relevant question is therefore not whether change occurs. Change is inevitable when replacing a failing building on a constrained site. The relevant question is whether that change has been carefully managed and whether the resulting public benefits justify any identified heritage effects.

The submitted Heritage Impact Assessment, prepared by a specialist heritage consultancy in accordance with Historic England guidance, concludes that the proposal preserves and enhances the setting of the adjacent listed buildings and the character and appearance of the Highgate Conservation Area. It is important to note that the site itself is not listed and the proposal involves no alteration to any listed structure. The heritage considerations therefore relate to effects on setting and townscape character rather than direct impacts upon the fabric or architectural integrity of a designated heritage asset.

While the ward councillor's late objection offers a subjective visual opinion on townscape prominence, the formal Heritage Impact Assessment prepared by WS Heritage represents an objective, expert study. It explicitly concludes that the existing derelict structure is a negative impingement, and that the replacement scheme directly references the materials, flat roofs, and character details identified in the Council's own Highgate Conservation Area Appraisal. This assessment is further supported by pre-application advice from the London Borough of Haringey under reference PRE/2025/0226, which stated that "the general size and scale of a part two-part three storey dwelling is also deemed acceptable in principle."

Should the council conclude that some degree of less than substantial harm arises, that harm must be weighed against the public benefits of the proposal in accordance with national policy. Those benefits are substantial and evidenced. They include the replacement of an uninhabitable dwelling



subject to a Prohibition Order; the delivery of a zero regulated carbon, fossil-fuel-free self-build home; resilience to overheating; improved accessibility; net gain in green infrastructure; a committed new street tree; full compliance with BRE daylight and sunlight guidelines at the most sensitive neighbouring property; and the long-term restoration of a neglected site to productive residential use. These are not marginal or incidental outcomes. They are substantive and policy-compliant benefits that the planning system is designed to recognise and support.

Viewed in the round, the proposal represents a considered, evidence-based and policy-aligned response to the challenge of reconciling heritage conservation with contemporary environmental objectives. It is not simply a larger replacement building. It is the result of a design-led optimisation exercise seeking to balance heritage considerations with housing quality, accessibility, energy performance, overheating resilience, biodiversity and long-term viability. Any meaningful reduction in scale would not produce a more modest outcome. It would produce an inadequate one.

The applicant remains available to discuss any outstanding matters with the case officer before determination.

I would also note that on Thursday 11th June I wrote to the case officer requesting the opportunity to review conservation officer comments before determination, a request that has not yet been acknowledged or actioned. I am making this submission in the absence of that opportunity being provided.

Yours sincerely

David Hayhurst

