

Eunice Huang
Planning Officer Haringey Council
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London N22 7TR

By email only to Eunice.Huang@haringey.gov.uk

Re: Land Adjacent to 29 Milton Park London N6 5QB – Application Ref:[HGY/2023/2691]
Our ref: ICE21.273.301.026
London, 29 November 2023

Dear Eunice Huang,

We refer to the objection dated 13 November 2023 from David Harmon of Norton Taylor Nunn Ltd. (referred to below as DTN) on behalf of Mr & Mrs Jordaan who it is assumed from the text live at 29 Milton Road. The matters raised are responded to as per the headings in the above.

Design

DTN say the proposal has '*failed to properly address the key expectations for this site*' but then fails to identify what these are and instead describes a failure '*to reflect the existing character of the area*' and describes the proposal being '*a modern departure from the buildings in the area*'.

The Applicant has engaged in discussions with amenity groups, in a pre-application consultation with the planning authority and presented different schemes for comment and advice. The Planning Authority gave clear pre-application advice that they did not wish to see any copy or pastiche of the existing buildings. The Local Plan encourages contemporary design. A '*modern departure from the buildings in the area*' has been approved and constructed in the conservation area as set out in the DAS (paragraph 7.9).

Despite the detailed evidence in the Applicants' Heritage Statement - DTM offer their opinions on the developer's approach (DTM page 2) and contradict the evidence of a local historian who records in the developer's own words - his approach to development. (Heritage Statement para 4.42).

DTM say that the Applicants' site contributes to a '*sense of uniformity*' that allows the side gables which are '*crucial to the quality of the conservation area*' to be seen. The Conservation Area Appraisal (which is a material consideration) allocates no significance to the side gables and none of the amenity societies when first consulted knew of, or considered there to be, any heritage significance in the existing gap site or gables.

The claim of uniformity is destroyed by even a cursory review of the other sites between terrace and semi-detached houses. None of the sites are the same size or shape, the side elevation at 25 Milton Park is rendered while the others are brick and is screened by mature trees. The gap between the properties at 35 and 37 Milton Avenue is completely closed with two garages and has no trees.

DTM say without any evidence that the original developer was uninterested in filling the gap to avoid detracting from the '*coherence*' of the terrace, that the plot was not built on because '*there was no space for a garden*' and that '*the gap is there because the two streets were clearly built by two different developers*'. [Section headed Heritage DTM page 6].

In fact, as can be seen from the evidence in the Heritage Statement the original developer:

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- squeezed a house onto the gap at 35 Milton Avenue by reducing the width of the house - there was never any intention to have 'coherence' between the gaps,
- developed a house with a six-metre garden to 82 Milton Park, and another at 17 Hornsey Lane Gardens with a thirty-five-metre garden - confirming there was no test as DTM put it of '*sufficient space*' for a garden - the garden was the space remaining when the house was built - or the land 'cut up' in the actual words of the developer at the time of the construction of the Miltons.
- completed Milton Park and Milton Road at the same time (Heritage Statement paragraph 2.27) and by the same person (John Cathles Hill) as evidenced by the Applicants' and the Objector's Land Registry titles.

Character and Appearance

DTM dismiss patterned brickwork because it appears on the Applicants' property. Any fair assessment would acknowledge that it appears on all dwellings on the south side of Milton Park.

Residential Amenity

The proposed development does not overlook or overshadow the Objector's property and two separate walls are shown on the application drawings - see PL2.2 - between the properties. The Applicant does not need the Objector's consent to build on their own land. The Party Wall (PW) etc. Act 1996 (deals with excavation etc. at the boundary even where there is no party wall) allows the development to proceed as drawn with or without the adjoining owner's consent.

Transport

As pointed out in other correspondence the development provides an additional on-street parking space in an area where the evidence of the parking survey refutes the substance of the objection.

Gas Pipe

The service connections across the Applicants' site to the Objector's property are unauthorised and no such rights exist in the Objector's freehold title or as easements in the Applicants' title. As noted separately such matters are not relevant to or material considerations for determination.

The Applicant has provided detailed evidence to support their application and sought evidence to support the assertions made for the heritage value of the site and found none. This objection in contrast seeks to support - without evidence - a preconceived opposition to any development on the site irrespective of the merits of the proposal or the evidence provided to support the application.

We have copied this letter to DTN and request that this letter is included in the 'files' tab on the application portal page.

Yours sincerely

(electronic signature)

Michael Rushe
Architect
for and on behalf of ICE Architects Ltd.

Cc: David Harmon of Norton Taylor Nunn Ltd. (DTN) (by email).
John Healy & Siobhan O'Shaughnessy - The Applicants (by email only)
Elisa Grilli - ICE Architects Ltd.