

1 The Avenue is a shared Freehold of three flats, I am one of the freeholders of this property. [REDACTED]. Permission for these works was neither sought nor given. **The leasehold of 1 A The Avenue states clearly that use of the garden is exclusive but that it must be kept ' in a proper state of cultivation'.**

The lease does indeed state this and that is why we spent a large sum of money updating the broken, cracked patio & pathways & replacing the falling down fence. This is what we are obliged to do under the terms of the lease.

This Edwardian building is from 1907 and of historic character. It is in a prominent position opposite the entrance to Alexandra Park on the corner of The Avenue and Dukes Avenue and typical of the highly valued architecture of this area. No 1 The Avenue falls within the Vallance Road Conservation area regulations. Any alterations to this property or the garden are protected by these guidelines.

In June 2023 the original garden was removed without notification, contrary to the incorrect statement made on this planning application, the previous **historic garden** was in line with these guidelines, other Haringey Planning regulations and **permeable**.

The garden has not been removed. It is very much still there with a slightly different configuration of the patio as the drawings before and after in the planning application clearly show.

In no way was this a 'historic' garden; there were no historic elements at all whatsoever. It was in need of repair, however.

The garden is permeable. This is clearly shown in the drainage report conducted by Mauro Persic, of Gamut Building solutions, filed with the application. It shows clearly that drainage and permeability has been improved due to the increase & positioning of soft standing in the new layout. Please review that information on drainage.

Existing foot paths were originally made of traditional red brick matching the building,

They did not match the building, they were different.

Here are some front driveways along The Avenue, directly in the heart of the Vallance Road Conservation area, that have recently been renovated to a high standard using paving slabs of various colours, including grey.

This 14 The Avenue.



This is 55 The Avenue:



they were permeable and only partial.

There is no evidence or substantiation for this.

A central lawn area and extensive wide flower beds with legally protected bluebells and rosebushes made up the majority of the garden.

All 7 of the original rosebushes still remain as per the plans we have submitted. We love these rosebushes and we diligently protected them, basing the entire design around them.

The bluebells are also still there - they tend to flower in May.

Any idea that they are not there is completely incorrect.

The garden included a pond which may have had newts, it was a wildlife haven.

This is not the case. We understand that there used to be a pond in the garden before we purchased the flat. The flat was empty for quite some time before we completed the purchase and the pond had, by then drained. The makeshift irrigation system was broken and the membrane compromised. It was just a hole containing stagnant rain water - that was 2013.

We have not been able to complete our planting plan and have been completely stalled by this issue - we can only plant once our layout is approved.

No ecology or sustainability reports were undertaken prior to this drastic change of use.

No 'change of use' has taken place - it is a relay of a patio in our garden.

By August 2023 the entire garden of 1A The Avenue was paved over with large grey paving stones, these were sealed and grouted, this creates a vast non permeable surface.

This is a direct contradiction to the drawings of our plan which have been submitted and are clearly displayed on the portal. There is a decrease in hardstanding and drainage has been improved as per the drainage reports from our surveyor.

There are two types of grey tiles. A large area by the house, which is supposed to be the site of the new pergola, is laid in a different contemporary grey and white pattern. Neither are in character with the building's historic character.

As per previous comments on tiles. Our tiles are very high quality, artisanal porcelain. If no grey tiles was a rule, pretty much all the gardens & driveways in the whole area would need to be relaid I expect?

In addition the red brick boundary wall alongside Dukes Avenue has been clad in light coloured slatted wood and a modern door has been fitted to replace the original garden gate.

The fence is not the subject of the planning app - it is a LFL replacement. Fatema Begum signed off that the fence height was allowed and appropriate in 2022.

The fence always went to the bottom of the driveway but it was falling apart. The new fence is solid rosewood and a vast improvement. It was pre stained and did not need to be treated at the time but will need to be stained in the future - a darker colour could be used.

The door replaces a totally broken ply wood door. It was swollen so we could neither open or close it. The new door is solid FSC wood, handmade in England with a wrought iron casing that prevents expansion in the changing weather conditions.

Fence before - coming to the bottom of the driveway:



Fence replacement - coming to the bottom of the driveway - just breezeblocks underneath.



Additional woodwork has been painted in pink.

A short piece of wood along the side of the garage in the garden has been cleaned off and painted in a greyed off lilac in readiness for our new flowering jasmine that will be planted there to grow over it. This is not materially relevant to the planning app as we are requesting sign off for our patio relay.

All of this is contravening conservation area guidelines. This extensive paving is already causing serious water damage inside the house and in the wider environment.

This is totally incorrect. We have a small patch of rising damp inside the communal hallway. We have had multiple reports and surveys completed. All concur that the cause of the damp is the breakdown or lack of a damp course to the porch. This can happen in old houses. This has nothing to do with paving. Ms Du Montule is fully aware of this as we have all seen the reports and are clear about the course of action. I am attaching one of the reports we have on this for your review.

There is insufficient drainage and water can be seen running off from the garden, across the pavement and into the sewers of Dukes Avenue after heavy rainfall and for several days afterwards.

We did have water running off through the gate as our garden tap was leaking. The tap was fixed about 2 weeks ago and it no longer leaks. This is a picture of the new tap. I have also attached the receipt for the work from the plumber. Again, you are welcome to come and see that the tap is no longer dripping onto the pavement. I appreciate Ms. Du Montule will not have been aware of this. There is no drainage issue.



The garden of 1A The Avenue is at a raised level of about 1,2 meters from street level, water runs off down a ramp through the garden gate.

As above. No longer happening as the tap is fixed.

There is already visible water damage on the garden level of the boundary wall.

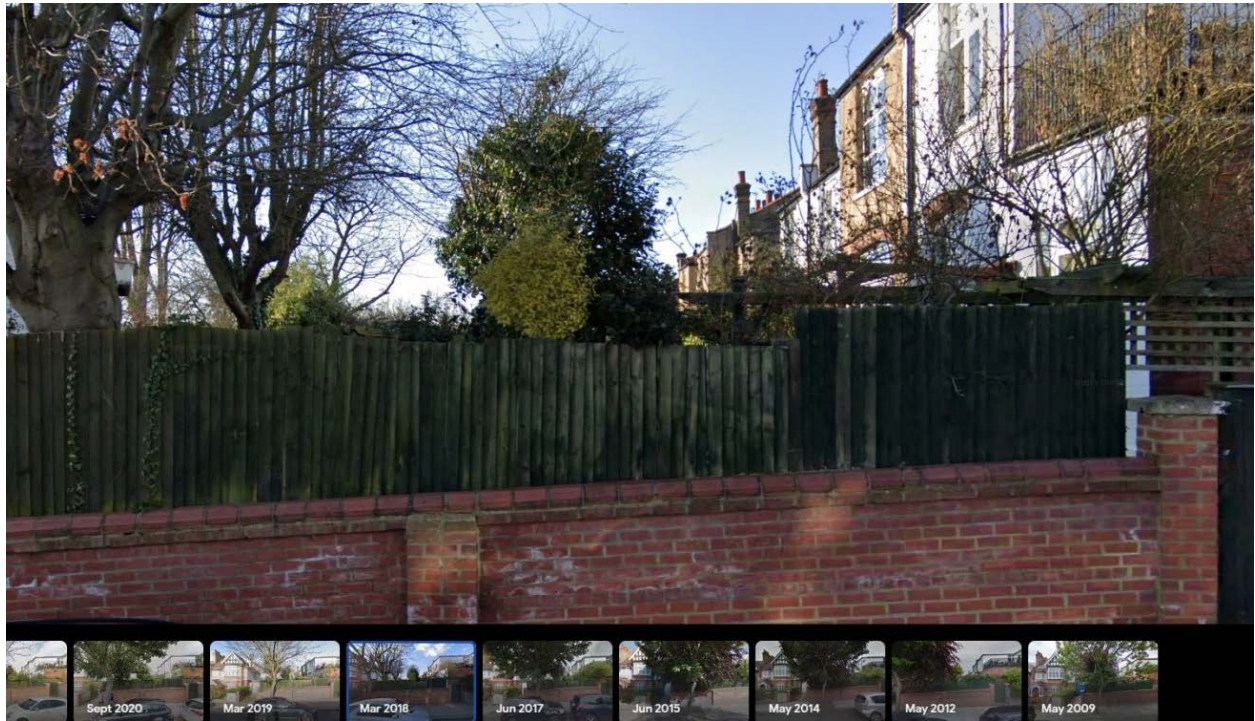
There is no water damage. The soil levels have always been high in the garden due to its location at the top of the hill and how quickly it slopes down, that has always caused some degree of white marks on the wall.

All of this can clearly be seen in the images in the planning app which also show the wall over time.

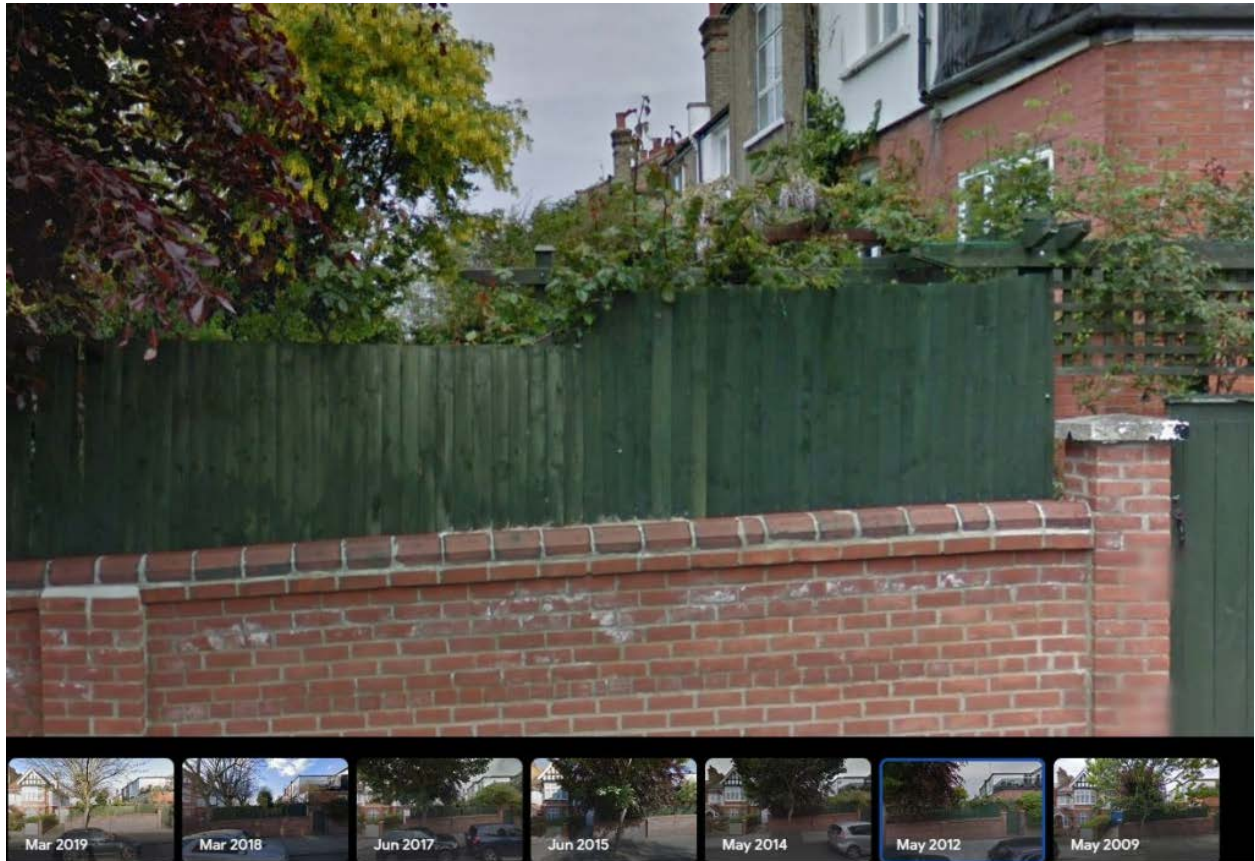
From prior to the rebuild of the wall:



From 2018:



From 2012:



We have had heavy rainfall recently and this damage has visibly occurred within six months of the build. From a sustainability point of view this garden design is going to be problematic in heatwaves. It will raise the temperature of the area and this building and create a hot and barren environment for wildlife.

Again, there is less hardstanding than previous as we have, more diverse planting and the trees have better access to water as now we have the large beds around them. This claim has no basis in fact and no substantiation whatsoever.

The exact opposite one would hope to find in a conservation area. There is insufficient planting to support pollinating insects.

In our planting plan which is part of the application, there is far greater diversity and plants to support pollinating insects.

We have not planted yet as we are waiting for the layout of our patio to be approved - this is clear from the application.

There are three established and protected trees in the garden of 1A The Avenue, which previously had unlimited access to water in the garden. If there are prolonged heatwaves looking forward, water available to these trees will be limited, this could cause subsidence to 1 The Avenue and damage these trees.

We have created a far better space around these trees as they were previously paved up to the roots. They have a regular bi-annual programme of tree maintenance for which our applications can be clearly seen on the Haringey planning portal, every 2 years. These works are carried out by a well respected and approved local tree surgeon who has operated in the area for many years: This claim is totally unsubstantiated.

We are built on clay soil, the stability of the soil in this garden is of paramount importance to the safety of the structure of this building. The planned gigantic, contemporary pergola is completely out of character and oppressive in this setting, a previous much smaller traditional pergola was made from wood with an open roof.

The massing of the pergola is broadly similar to previous and also similar to other structures along the avenue which we have shown in our application. The roof of the wooden one was slatted exactly as the new one. It will provide us all with some element of privacy in our outside spaces as currently the roof terrace of flat C overlooks all of our garden. This is a far safer structure. If there is a desire to have Edwardian features in all of the gardens of the area; pergolas in gardens originate from the Edwardian era.

This new planned design not only contravenes conservation area guidelines and is too big for such a small garden, it also prevents access to my bedroom window for emergencies in a fire or even to our window cleaner.

Our window cleaner, who has cleaned the windows at the property for years, cleans with a long extendable pole. He does the higher windows at a distance that allows him to angle the pole to the higher windows. He cleans the upstairs

window at the side from the street in fact. The pergola will not prevent upstairs windows being cleaned. The pergola will not prevent access to the upstairs window.

This is a shared house in a conservation area, this garden design is entirely unsuitable for this setting and location. It contravenes Haringey's Conservation and Planning regulations for this area, the UK Environment Agency's water run off regulations for urban developments, the terms of the applicant's leasehold and wider sustainability and environmental guidelines.

As all previous points.