

Eunice Huang
Planning, Regeneration & Economy
Haringey Council
Level 6
River Park House
Wood Green
N22 8HQ

22nd May 2024

Dear Ms Huang

Re: Harcourt House, 16-17 Haringey Park, London, N8 – Objections to Planning Application

I am the Leaseholder of Flat 3, 16-17 Haringey Park, London, N8 ("My Flat").

I bought My Flat in October 2006. It was my main dwelling for a few years before I moved to Hertford Heath. However, I retained the title to My Flat and since then I have rented it out. My latest tenants moved in early this year. Since October 2006 I have had extensive dealings with the Landlords of Harcourt House, Southern Land Securities Ltd, and their agents. These have made me extremely wary of both the way that they do business and the truthfulness of any statements that they, their agents and/or any of their subsidiary/associated companies might make. I would categorise Upspace Limited as a subsidiary/associated company.

I wish to object to the Planning Application for Harcourt House. In doing so I hereby adopt, in its entirety, the letter from Diana Thomson of Savills (together with all of its attachments and appendices), who have been instructed by the Leaseholders of Harcourt House.

In addition I have the following comments :-

1. The Structure of Harcourt House

I refer to the Report of Akera Engineers dated 2nd May 2024.

With regard to "Disproportionate Collapse" they state that, because the building will change from class 2a to 2b, it *"will require the need to introduce effective horizontal ties and effective vertical ties throughout the building structure. This is impossible to achieve without causing major disruptions to the flat demises on the floors below."*

On the issue of "Foundation loads" the Report advises that this is not the first upwards extension of Harcourt House. An additional floor was added to the original Victorian buildings in the 1920s. It is generally accepted that the foundation loads of existing structure can be increased by up to 10%.

However, the Report goes on to point out that the *“combined effect of the 1920s extensions and the proposed extension will be to increase the loading onto the foundations by well in excess of 10% compared to the pre-1920s loads”*.

The Report states that an exercise into the condition of the foundations of Harcourt House needs to be undertaken but that *“the conclusion is very likely to be that the existing foundations will require modification to ensure that the bearing pressure under the foundations is less than the bearing capacity of the ground”*. Such modifications *“will require excavation and will cause major disruption”*. Furthermore *“strengthening of the external walls may be required and will impact the appearance of the building as works cannot be carried out internally due to the flats being occupied”*.

On the issue of “Extension floor build up/construction detail” the Report concludes that *“It is unlikely that the Existing roof rafters/joists will be capable of supporting this larger loading...also...that the loading of the extension roof and walls will land onto the existing roof further increasing the loading onto the roof”*.

I find the unambiguous wording of the Akeru Engineers’ Report extremely worrying. Insufficient consideration seems to have been given to the load bearing capacity of Harcourt House’s foundations, walls and roof rafters/joists. Accordingly, there is a very real risk that such an extension could cause serious structural collapse of Harcourt House. Obviously, this would result in a considerable loss of property to all Leaseholders but, most importantly, there would be a serious risk of loss of life and limb to all of the building’s occupants as and when such a collapse occurs. Therefore, I believe that to allow the Applicants to proceed on the basis of the current Planning Application could potentially be described as both reckless and negligent. Obviously a post-collapse analysis/investigation would be significantly more critical.

2. The Applicant’s lack of Consultation with the Leaseholders

The Leaseholders were only informed about the Planning Application after it had been submitted. This flies in the face of planning guidance from central government (NPPF 2023 Pt 137) which *“encourages applicants to work closely with those affected by their proposals to evolve designs that take account of the views of the community”*.

3. The loss of privacy, daylight and amenities to existing Leaseholders and/or their tenants

The proposed extension will compromise the privacy of My Flat. The extension, in particular its new balconies, will create a new overlooking into both the living room and main bedroom of My Flat. This overlook will only be a matter of a few meters.

Access to the communal gardens at the back of Harcourt House are the only outdoor amenities available to My Flat, as I believe is the case for 7 out of 8

of the current flats in Harcourt House. An additional floor to the building will increase the overshadowing of these gardens resulting in a noticeable loss of amenities for my tenants and all other residents.

4. Planning Application drawings

Experts appointed by Savills on the Leaseholder's behalf have concluded that the drawings submitted on behalf of the Applicants are both inaccurate and misleading. They point out that if the drawings properly and accurately represented the design then the proposed extension would be significantly taller. Consequently, the visual impact of the extension will also be greater than those presently submitted. In this respect I refer you to the Reports of both Akera Engineers and Ashton Architects (dated 8th May 2024), together with Savills' comments thereon.

5. The Safety of the existing building

In addition to the issues raised under point 1. above the safety of the existing building is further compromised by the fact that the extension will mean that it would be classified under a different fire and structure category. The proposals in the current Planning Application fail to set out how the building will remain compliant with the relevant Building Regulations and/or any other relevant Health & Safety legislation. In particular the need for sprinklers, smoke vents and protected fire lobbies are conspicuously absent. This apparent lack of concern for the residents of Harcourt House is very concerning.

6. The effect of the proposed extension on surrounding properties

I have already mentioned at 3. above, that the extension will overshadow the communal garden at Harcourt House. It will also have a detrimental overshadowing effect on some of the surrounding properties and will increase overlooking of some private gardens (Primezone Mews, Pinehurst Mews and 18 Haringey Park)).

Harcourt House is already the tallest building on the north side of Haringey Park at 4 stories high. At 5 stories high it would be significantly higher than the nearby 2-3 storied mews buildings. This does will not add to the aesthetic look of the area.

7. Crouch End Conservation Area

One of the only remaining historical features of Harcourt House from the 1920s extension is the stepped parapet. Under the Application this would be removed/destroyed to create a bland and uniform façade to Harcourt House. This cannot be seen as an improvement.

The planning drawings do not contain sufficient detail for anyone to be assured that the quality of the materials used in the proposed extension will be of the highest quality appropriate for the Conservation Area.

8. London Plan housing standards

I have already drawn your attention, in 4. above, to the substandard drawings submitted on behalf of the Applicants. This is also a factor in the fact that the new flats would appear to be of poor quality and will not fully meet London housing standards. The ceiling heights will be well below the 2.5-meter requirement if the necessary steel structure were shown on the planning drawings. In addition, the balconies will not be the required 1.5 meters deep, as the 300mm brick parapet (which is shown on the drawings) will reduce the balconies to a depth of 1.2 meters.

Furthermore, there is no lift access to the 4th Floor and no details are provided in respect of the waste and cycling parking for the two new flats.
Yours sincerely

Summary

I would submit that the lengthy list of defects and problems of the current Planning Application, sometimes individually but certainly when viewed collectively, are a considerable cause for concern and should result in the Planning Application in its current form being comprehensively rejected.

For the avoidance of doubt, I hereby put you on notice that I reserve the right to produce this letter, and any subsequent and/or associated correspondence and/or documentation before any Court/Tribunal/committee, at any later date, as I shall, in my absolute discretion, deem appropriate.

Yours sincerely

John Howes