



Harcourt House, 16-17 Haringey Park, N8 9JB

22.05.24

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1.0 Introduction:

- 1.1 Ashton Architecture has been instructed by the leaseholders of Harcourt House owners to review the submission information relating to application ref HGY/2024/0921 for the erection of one additional storey at roof level to existing building to provide two self-contained apartments, plant and associated works.
- 1.2 The leaseholder group has raised concerns with how the application information has been presented, and the potential physical implications for the existing building which are not highlighted.
- 1.3 This statement highlights specific discrepancies presented in design proposals, but does not seek to impart any qualitative view on the design concept itself.

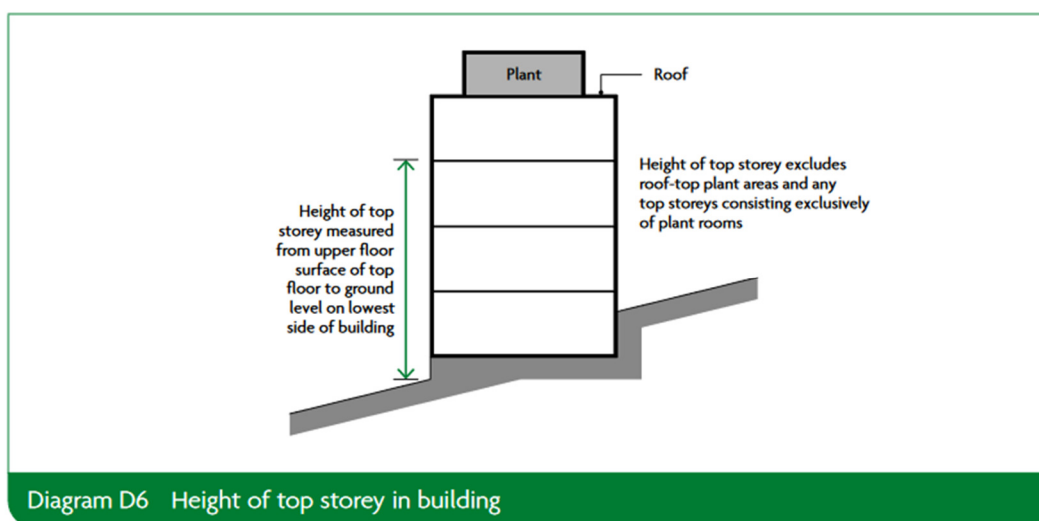
It is imperative that the LPA can satisfy themselves that the proposals as presented clearly reflect the reality of what will ultimately be delivered in the built form should this application be approved.

We request the LPA to seek clarifications from the applicant on the points raised in this report.



2.0 Building Height:

- 2.1 It is concerning that no design information relating to fire strategy has been submitted with the application proposals, given the increased height will trigger the 11m rule which, as described in the Building Safety Act 2024, which requires 'building-wide' changes to meet the new regulations. These changes will likely impact the presentation of the application proposals.
- 2.2 The proposed development comprises an additional storey of accommodation on the existing roof of Harcourt House. The proposed development is considered to be the 5th storey of habitable accommodation on the site.
- 2.3 The existing topography of the site slopes downwards towards Landrock Road – resulting in a finished floor level of 11.30m above the ground level to the front, although this increases at the rear to around 13m. As evidenced in the application drawings, 0.0 is not taken from the existing ground level, and therefore the actual floor level is deemed to be far in excess of 11.30m. Please refer to Diagram D6 of Part B2 of the British Building Regulations noting the measurement point for the height is from the lowest part of the adjacent ground:



- 2.4 The Building Safety Act 2024 introduces additional requirements for buildings with a top floor of 11m or over, including the requirement for a sprinkler system throughout the entire building [*all flats, including those existing*].
- 2.5 No proposed floor plans have been provided for the existing flats 1-8, which means there is no information describing any internal protected lobbies to these existing apartments. Nor is there any information relating to how any sprinkler systems would be retro-fitted to these apartments, or provision of plant facilities for tanks and pumps.
- 2.6 The 2022 amendment to the British Building Regulations Part B requires all residential use buildings with a floor over 11m should have external wall surfaces that achieve Class A2-s1,d0. No



information has been submitted in relation to demonstrating the existing building fabric complies with this requirement.

- 2.7 The 2022 amendment to the British Building Regulations Part B requires a The 2022 amendment to the British Building Regulations Part B requires all balconies in residential use buildings with a floor over 11 m should be non-combustible or achieve specific requirements, e.g., fire resisting soffit and non-combustible band separating compartments. No information has been submitted in relation to the fire integrity of the proposed balconies at the property.
- 2.8 The 2022 amendment to the British Building Regulations Part B requires limits of combustable materials used over 11m. The application proposals comprise a sheet cladding material at roof level. No information has been provided to demonstrate that this does not pose an increased fire risk at the application property. This is of particular concern given recent issues relation to cladding, PIR insulation and associated certification.
- 2.9 There does not appear to be any provision for an automatic opening vent [AOV] at the head of the stairwell which is a Building Regulation requirement. This must be positioned at the highest point of the stairwell, and it is unlikely to be flush to the roof finish.
- 2.10 The 2022 update of British Building regulations Part B1 [paragraph 3.28] states that a small building can have a single staircase, provided it meets the following criteria;
- A. The top storey of the building is a maximum of 11m
 - B. The single stair can be protected by separate lobbies as per the diagram below.

The application proposals do not currently meet either of these criteria. The introduction of an AOV may satisfy point B [as noted in diagram 3.9 below] if all other flats have internal protected entrance lobbies – no evidence of this has been provided with the application proposals. In addition, no AOV is shown on the application proposals.

However, the more significant issue remains that the single staircase does not meet the requirements of Part B of the Building Regulations where the building has a top floor level over 11m.

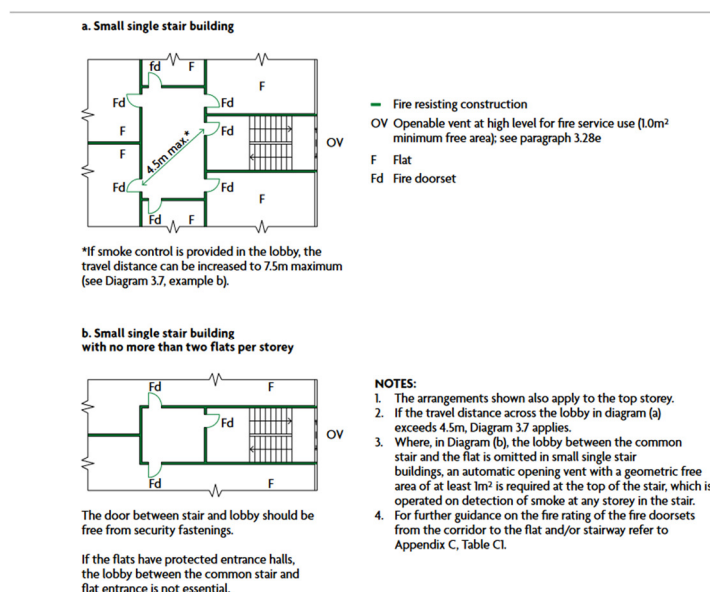


Diagram 3.9 Common escape route in small single stair building



3.0 Works to existing chimney stacks:

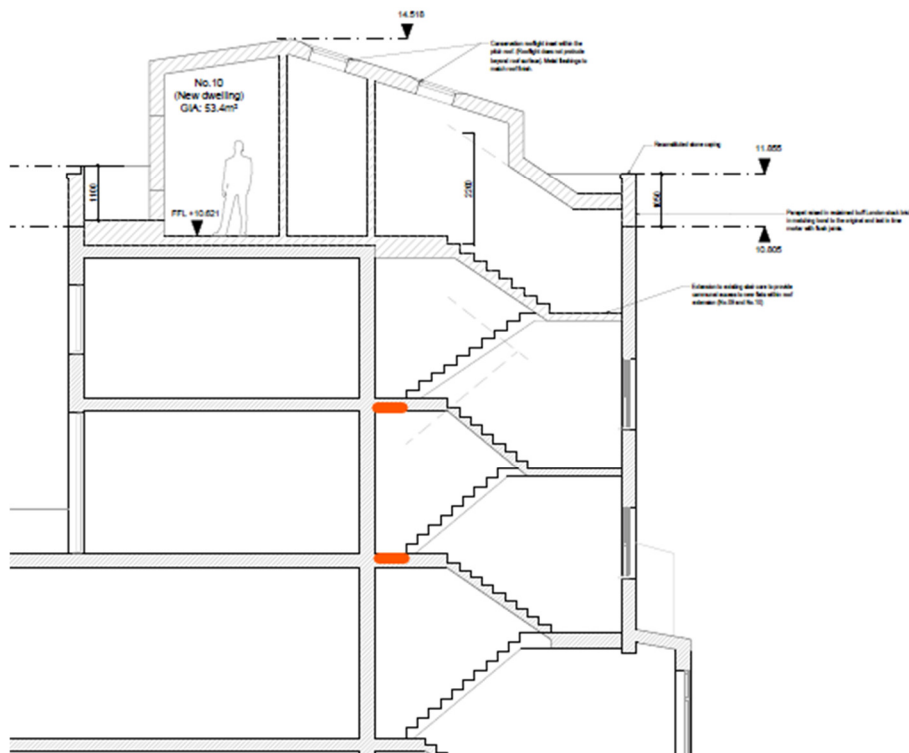
- 3.1 It is noted that the existing chimney stacks are proposed to be raised as part of the application works.
- 3.2 There is no specific information confirming the dimensional increase in height, nor any information relating to the current use of the flues serving the flats below, and adjacent properties at 18 Haringey Park.
- 3.4 Assuming the side roof windows are openable [to meet the requirement of dual aspect accommodation of the London Plan], the chimneys would need to terminate at least 1m above the top line of the windows.
- 3.3 The proposed raising of the chimney stacks should comply with the Building Regulations requirements for termination above weather surfaces, as outlined in Diagram 17 of Part J – highlighted below. This will require the chimney stacks to be increased in height:

Point where flue passes through weather surface (Notes 1, 2)		Clearances to flue outlet
A	At or within 600mm of the ridge	At least 600mm above the ridge
B	Elsewhere on a roof (whether pitched or flat)	At least 2300mm horizontally from the nearest point on the weather surface and: a) at least 1000mm above the highest point of intersection of the chimney and the weather surface; or b) at least as high as the ridge.
C	Below (on a pitched roof) or within 2300mm horizontally to an openable rooflight, dormer window or other opening (Note 3)	At least 1000mm above the top of the opening.
D	Within 2300mm of an adjoining or adjacent building, whether or not beyond the boundary (Note 3)	At least 600mm above any part of the adjacent building within 2300mm.
Notes 1) The weather surface is the building external surface, such as its roof, tiles or external walls. 2) A flat roof has a pitch less than 10°. 3) The clearances given for A or B, as appropriate, will also apply. 4) A vertical flue fixed to an outside wall should be treated as equivalent to an inside flue emerging at the nearest edge of the roof.		



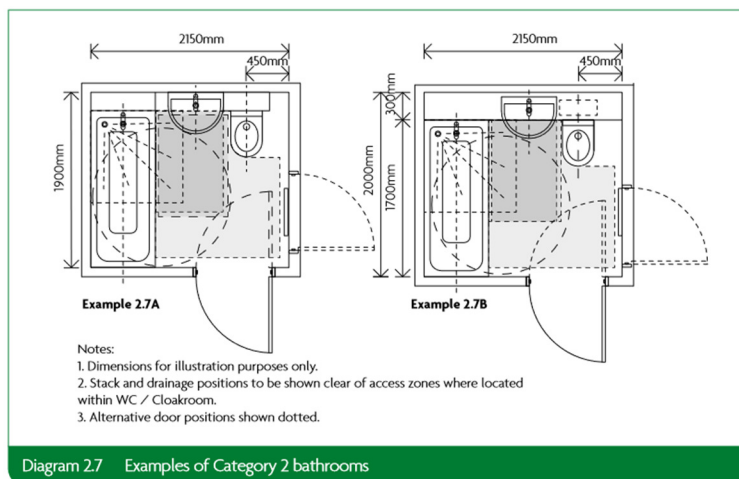
4.0 Design, Amenity and Buildability matters:

- 4.1 The design information supporting the application proposals does not include any details on the existing or proposed bin and recycling facilities on the site.
- 4.2 The design information supporting the application proposals does not include any details on the existing or proposed cycle storage facilities on the site.
- 4.3 Any storage will require a weatherproof enclosure, which will impact on the design proposals as currently presented.
- 4.4 The proposed application drawings do not show any services penetrations through the walls or roof, for items such as flues, extraction, soil pipes and ventilation. Given the proposed homogeneous appearance of the proposals, these fittings will likely have a strong visual impact on the proposals.
- 4.5 Referring to AKERA's structural report, there appears to be no allowance for new structural zones to support the loading of the proposed development, which will likely mean the proposals will be increased in height once a structural design is determined. Additionally, no information has been provided concerning roof drainage, downpipes, gutters, hoppers and overflows, which may also impact on the levels of this proposal.
- 4.6 The proposed sectional drawing BB shows very small landings at upper floor levels which look incorrect, and raises concerns that the building has not been properly surveyed.

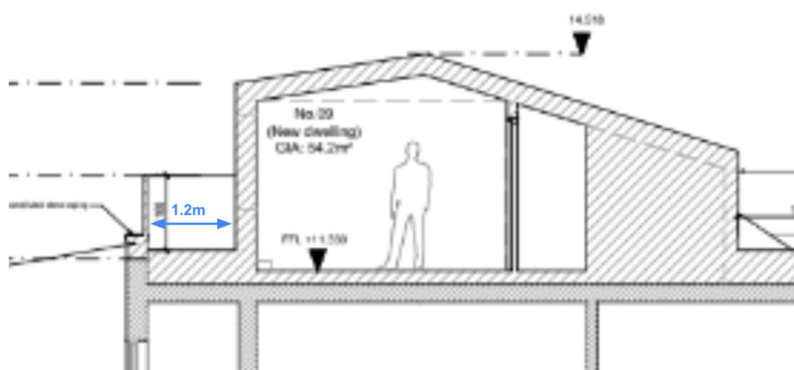




- 4.7 The new plant room at roof level is accessed via the parapet. No provision for any required safety measures such as edge restraint apparatus has been shown, which will likely impact the external appearance of the building visible from street level.
- 4.8 The London Borough of Haringey's Local Plan (2017) states that all new residential development must provide 90% Part M4(2) complaint dwellings and 10% M4(3) compliant dwellings. The Applicant has certified in the applications form [p13] that the units comply with Part M4(2). However, on review of the application proposals, there are areas where the requirements of Part M4(2) are not met, including:
- No level access to external amenity spaces is being provided; *level access is a requirement of Part M4(2)*
 - The communal corridor appears to be less than 1.2m in width; *corridor width of at least 1.2m is a requirement of Part M4(2)*
 - 300mm leading edge nibs not provided on apartment entrance doors; *a 300mm leading edge nib to main doors is a requirement of Part M4(2)*
 - The bathroom does not meet the requirements set out in diagram 2.7 in AD Part M4(2):



- 4.8 There is a discrepancy between how the proposed balconies are shown on plan and section. On plan, the depth is shown as 1.5m to the balustrade, but on section the balustrade is set further in, reducing depth to approximately 1.2m – which is below the London Plan requirements.



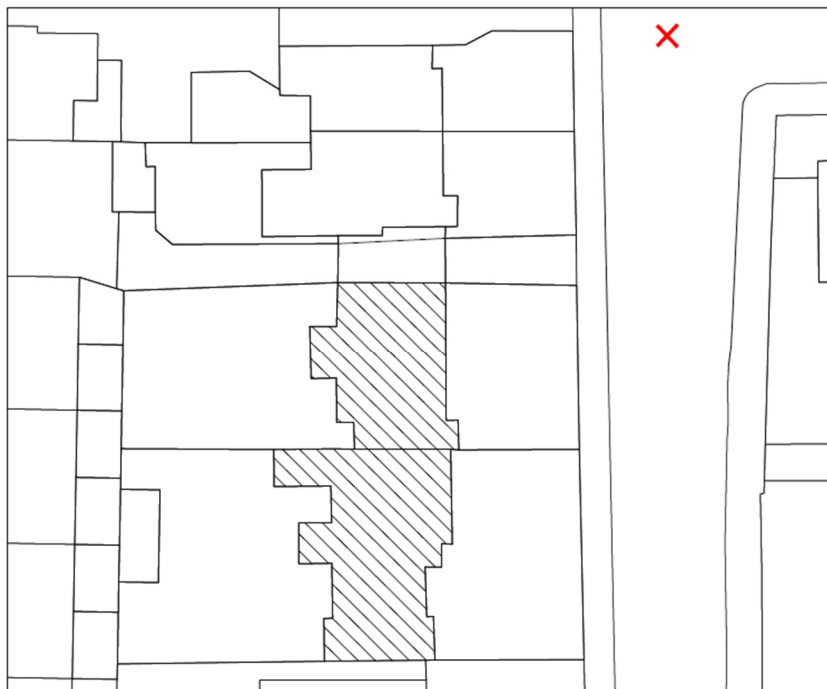


5.0 Presentation of CGI information:

- 5.1 The following CGI graphic has been submitted as part of the application documents, showing the proposed changes to the existing building – with the rooftop addition not in view.

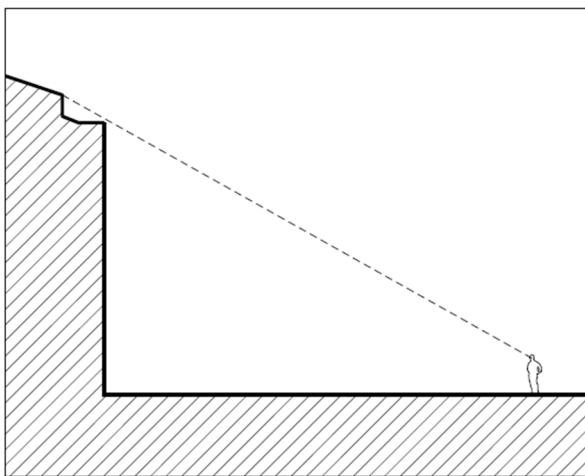


- 5.2 It appears the CGI position is taken from the centre of the Haringey Park road, in the position marked X below:





- 5.3 Our assessment is that the proposed additional storey to Harcourt House will be visible from this position, as demonstrated in the sketch section below – noting that the ground line is lowered by 0.5m to account for the approximate street levels:



- 5.4 It would be helpful to provide clarity on the exact position the CGI is positioned from, in order for the visual impact of the application proposals to be fully understood.



6.0 **Summary:**

- 6.1 The points raised in this statement relate to discrepancies and incomplete information in the application documentation which, when resolved, will likely impact the design proposals currently under consideration.
- 6.2 Supplementary issues raised by the report prepared by AKERA Engineers highlight the potential enhancement works needed to the existing structure to support the application proposals, which again would likely impact the design proposals currently under consideration.
- 6.3 The application proposal concept is of a modern and smooth / sleek roof top addition with all elements being flush to the roof cladding. For this approach to be successful, it requires clarity that the design can be delivered without the changes to the application proposals. As highlighted in this statement, there are significant building and construction matters which will likely result in the application proposals requiring modification.
- 6.4 The generally slim wall, floor and roof build ups as shown in the application drawings may need to increase, which will put strain on the building envelope increasing in size.
- 6.5 The building height triggers the 11m rules of the Building Safety Act, which will necessitate works throughout the building – some of which will impact externally, likely resulting in future application amendments, if not knowingly determined through this application.
- 6.6 The discrepancies raised in this report highlights key parts of the application proposals which we believe cannot be delivered in their current form – and require the applicant to address these issues with revised proposals.
- 6.7 It is incumbent on the case officer to pay due attention to the lack of fire safety information accompanying the application documentation – without which a full understanding of the fire safety implications of the proposed developed can be assessed. Given the specific leaseholder concerns in relation to fire safety of the application proposals, we strongly encourage the case officer consult with the Haringey Building Control department, and the London Fire Brigade for their comments on the application proposals, as a matter of public safety.
- 6.8 We trust the LPA will review the information in full and request clarification from the Applicant in respect of the points raised in this report.