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Dear Ms Huang

Application for the erection of one additional storey at roof level to existing building to provide two self-contained apartments, plant and associated works at Harcourt House, 16-17 Haringey Park, Hornsey, London, N8 9JB

We write on behalf of the leaseholders of Harcourt House to object to the planning application made by Upspace Construction Services ('the applicant') for the "*erection of one additional storey at roof level to existing building to provide two self contained apartments, plant and associated works*" at Harcourt House, 16-17 Haringey Park, Hornsey, London, N8 9JB ('the site') under application reference HGY/2024/0921 ('the application').

The proposed development is for an upward extension to provide two additional residential dwellings. We set out within this letter why we object to the planning application and why we believe the information contained within the submitted application is insufficient for officers to be able to fully assess and determine the application. The reasons for our objection, and our comments on the application are set out under the following headings:

- Design and Appearance
- Standard and Quality of Proposed Residential Accommodation
- Impact on Neighbouring Residential Amenity
- Transport Considerations

This letter is supported by a Technical Note prepared by Ashton Architecture with regards to design matters, provided at **Appendix 1**. In addition to the points raised under the headings above, we would like to draw officers' attention to the commentary in the technical note prepared by Ashton Architecture with regards to the inaccuracy of the submitted planning drawings and reports, and request that these are updated and reconsulted on prior to any determination of the planning application.

A separate heritage assessment on the proposals' impact on the Crouch End Conservation Area and the adjacent locally listed buildings is provided by Portico Heritage at **Appendix 2**.

Please also find enclosed at **Appendix 3**, a Structural Report prepared by Akera Engineers which covers structural matters and raises concerns about the deliverability of the proposals.

1. Design and Appearance

The proposed design approach to the proposed roof extension is noted and it is acknowledged that the



proposals have been amended in response to feedback from officers as part of the pre-application process. We do, however, consider it important to draw officers' attention to paragraph 124 (e) of the NPPF (December 2023). In the context of seeking to make effective use of land, the NPPF acknowledges that opportunities to use the airspace above existing properties should be supported. However, further commentary is provided which seeks for such developments to "*be consistent with the prevailing height and form of neighbouring properties and the overall street scene, ...well-designed (including complying with any local design policies and standards)*". We are concerned that the proposed extension is not consistent with the prevailing height and form of neighbouring properties and would in fact result in a building which is significantly taller than its neighbours.

The submitted plans have been reviewed by Ashton Architecture as set out at Appendix 1 and there are a number of instances of discrepancies in the plans which we request should be interrogated by officers prior to the determination of the application. We request that updated drawings are requested from the applicant which address the following:

- proposed sections and elevations should be revised to show the correct site levels and resulting finished floor levels;
- existing and proposed floor plans of existing properties, stairwells and communal areas to be provided, with correct dimensions throughout (and for any measures required to ensure compliance with requisite fire regulations shown), and in accordance with the Council's planning application validation checklist requirements;
- existing and proposed floor plans of the ground floor to be provided (as details relating to refuse and recycling, and cycle parking provision are absent from the current submission);
- proposed sections and elevations to be revised to show dimensions of proposed increase in height to raised chimney stacks (and for visual impact of these to be tested);
- proposed sections and elevations to show requisite structural allowance, services and how these details will be treated;
- correct measurements of proposed balconies to be provided on proposed sections and elevations (and for these to be revised to comply with London Plan standards); and
- larger scale floor plans of the proposed new flats demonstrating compliance with Approved Document Part M4(2).

Only once the plans have been updated to correct inaccuracies and missing information can the full potential impact of the proposals be reviewed and assessed.

Impact on Conservation Area and Heritage Assets

The site is located within the Crouch End Conservation Area and is to the east of the Grade II listed Hornsey Library and Grade II* listed Hornsey Town Hall. Additionally, there are a number of non-designated heritage assets near to the site including the adjacent 13-15 Haringey Park and 29-30 Haringey Park, both of which are locally listed. Given the site's heritage context, the leaseholders of Harcourt House have appointed Portico Heritage to review the proposals and a supplementary letter is provided at Appendix 2 for consideration by officers.

The Crouch End Conservation Area Appraisal (September 2010) notes that Nos. 16 and 17 Haringey Park is considered to have a neutral impact on this part of the conservation area. The proposals have been reviewed in detail by Portico Heritage, and it has been concluded that they will not preserve or enhance the character of appearance of the conservation area and will fail to make a "*positive contribution to local character and*

distinctiveness” as sought by paragraph 203 of the NPPF.

As set out in the Ashton Architecture note, the accuracy of the provided CGI is queried and should be updated to ensure that all details of the proposed extension are shown (as above), and that the viewpoint of the view is verified for accuracy. At present, there is inaccurate and insufficient information for officers to be able to assess the application’s impact on the conservation area and surrounding heritage assets.

The submitted Design and Access Statement does not provide sufficient details on materiality to demonstrate that the proposed extension will be of the highest quality and contribute towards the character of the Crouch End Conservation Area. We request that this information is provided before a decision is made. Given the site’s heritage context, it is not appropriate for this to be secured by way of condition, if officers are minded to recommend the application for approval.

It will be important for officers to be content that the proposed extension either preserves or enhances the surrounding heritage context and we are concerned that at present, there is insufficient information provided within the application to be able to draw this conclusion. Based on the material provided to date, Portico Heritage do not consider the proposals to preserve or enhance the surrounding heritage context, and have instead concluded that the proposals will lead to an element of less than substantial harm.

Additional information should be provided by the applicant and this should be reconsulted on prior to any decision being made. Officers will need to be confident that the proposals can comply with paragraph 212 of the NPPF, Policy HC1 of the London Plan, and Policy DM9 and SP12 of the Local Plan.

2. Standard and Quality of Residential Accommodation

We have reviewed the submitted proposed drawings alongside the Design and Access Statement and consider that the proposed two additional 1-bedroom flats could be of insufficient quality to be in accordance with the development plan.

Housing Quality

Policy D6 of the London Plan relates to housing quality and standards. The policy states that housing developments should avoid the provision of single aspect dwellings. The submitted Design and Access Statement states that the proposed flats are both dual aspect. The main aspect is north facing, while the supposed second aspect is through a very small and obscured window in the bathroom of Flat 9 and through an obscured window (onto a blank wall and chimney flues) in Flat 10.

Dual aspect is defined within the London Plan as a dwelling with openable windows on two external walls. The submitted plans do not specify whether the side windows are openable so we would request that this information is sought from the applicant. However, as they are obscured and in the case of Flat 9, very small, it is considered likely that even if they are openable, they may still not meet the definition of being dual aspect.

Paragraph C5.2 of the Housing Design Quality Standards SPD sets out that single aspect dwellings that are north facing should not be permitted. Therefore the provision of single aspect north facing dwellings would be contrary to Policy D6 of the London Plan and supporting design guidance.

Compliance with Residential Space Standards

Policy D6 of the London Plan also requires dwellings to meet the gross internal floor areas as set by the Nationally Described Space Standards. For a 1-bedroom, 2-person flat, the minimum size is 50sq.m. While the submitted plans set out that Flat 9 will be 54.2sq.m and Flat 10 will be 53.4sq.m, Policy D6 states that any area with a headroom of less than 1.5 m is not counted within the GIA and that the minimum floor to ceiling height must be 2.5m for at least 75% of the GIA of each dwelling. It appears from the submitted plans that there may be significant areas of the proposed flats with reduced ceiling heights. We request that this is clarified so that officers can satisfy themselves that the proposed dwellings are of sufficient size and quality.

We would also like to draw officers' attention to floor build up and finished floor levels which do not appear to have been taken into consideration on the submitted drawings. Further commentary on this is provided in the Ashton Architecture note and the Akera Engineers Structural Report.

In addition, it is a Council validation requirement to provide details of compliance with Approved Document Part M4(2). The submitted application form says that the proposals will comply but there is no evidence of this provided within the submission. Floor plans should be provided demonstrating compliance with the requisite standards.

Private Amenity Space

The proposed dwellings include the provision of private amenity space in the form of balconies. Whilst it is encouraging to see the provision of private outdoor amenity space, Policy D6 of the London Plan states that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5 m.

The balconies are shown as being 1.5 m in depth, however, the drawings have not accounted for the 300 mm brick parapet. Therefore, the plans appear to be misleading as the depth of the balconies will be 1.2 m, which is below the 1.5 m threshold and will not, therefore, meet the minimum requirements set out in Policy D6 of the London Plan.

Overall, it is considered that the two residential dwellings as currently proposed are of insufficient quality and contrary to the ambitions of Policy D6 of the London Plan and the requirements of Haringey's Local Plan Policy SP2.

Fire Regulations

As set out in the Ashton Architecture Technical Note at Appendix 1, the finished floor level of the proposed new accommodation is deemed to be above the 11m threshold, which would mean that the fire regulations set out in the Buildings Safety Act 2024 should be complied with in existing and proposed flats.

It does not appear that the submitted proposals have considered the relevant fire regulations in any detail for officers to be able to determine the application. This is especially with regards to access and egress of existing and potential future occupiers, as required by paragraph 124 (e) of the NPPF with specific regard to upwards extensions. This is of significant concern to my clients, the existing residents of the Harcourt House property. The proposal does not demonstrate what material amendments will be required in existing flats to comply with the new fire regulations or how potential harm to amenity due to the impact of alterations will be avoided. It is imperative that any proposals do not unduly affect the safety of existing residents.

We request that the updated drawings as set out above should be provided and that once this information has been submitted, Haringey Building Control and the London Fire Brigade should be consulted and only once they have provided their inputs can the application be determined.

3. Impact on Neighbouring Residential Amenity

The proposed development could cause harm to residential amenity for both those existing residents within Harcourt House and those in neighbouring properties.

Daylight, Sunlight and Overshadowing

The increase in height will inevitably increase the overshadowing on neighbouring properties, particularly the 2-3 storey Primezone Mews and Pinehurst Mews (not shown in the existing and proposed plans and drawings) and the communal gardens to the rear, the only outdoor amenity for most existing residents at Harcourt House. These are already north facing and the lack of sunlight will be exacerbated by the proposed increase in height of Harcourt House.

The applicant's daylight and sunlight assessment is provided on page 24 of the Design and Access Statement. However, it is not adequate and appears to be either altered or incomplete. This does not constitute a full and proper assessment of daylight, sunlight and overshadowing impacts. This should be provided to allow officers to fully consider the impact of the proposals on the amenity of surrounding residential properties.

Overlooking

There is also additional overlooking to existing Harcourt House properties which Harcourt House leaseholders object to and should be interrogated by officers. The leaseholders have identified potential conflicts affecting Flat 4's bedroom window and kitchen-diner, and Flat 7's private terrace.

Noise

No assessment of the impact of the proposals on noise has been provided as part of the planning application submission. There will be impacts both during the construction phase and once the properties are occupied, and details of what noise mitigation measures would be put in place should be provided prior to the application's determination.

Structural Considerations

In addition to the above, the Structural Report prepared by Akera Engineers and provided at Appendix 3, also identifies concerns with the proposals from a structural perspective. It draws conclusions in terms of necessary alterations to existing demises, likely necessary excavations and alterations to existing foundations, and insufficient allowance in the size of proposed roof structure, which will likely impact either the proposed ridge line or internal ceiling height or both. As these are material planning matters, we request that officers review and request additional information and amended drawings from the applicant as necessary, then take it into consideration in the determination of the proposals.

4. Transport Considerations

Car Parking

The Council's pre-application advice to the applicant following the meeting in September 2023 identified concerns surrounding the lack of car parking proposed and this does not appear to have been adequately addressed within the planning application submission.

Local Plan Policy DM32 sets out support for proposals with limited or no on-site parking where there are alternative and accessible means of transport available, and a Public Transport Accessibility Level (PTAL) rating of 4 or above. The application site has a PTAL rating of 2, so does not meet this threshold and could therefore lead to additional parking stress within the vicinity of the site, which is contrary to the requirements of Policy DM32.

Cycle Parking

The planning application submission makes reference to four cycle parking spaces being provided and that these are to be *"sensitively located to ensure that the character and appearance of the streetscape and Conservation Area will be maintained in accordance with the Policy DM35 of the Development Management DPD"*.

The Council requested *"Full dimensional and layout details will be required, including the system intending to be used, with scaled drawings showing the proposed arrangements and detailing how the manufacturer's specifications for installation are met"* in the written feedback provided following the applicant's pre-application meeting in September 2023. The submitted plans do not provide these details. This information should be requested from the applicant before the planning application is determined.

Refuse and Recycling

The planning application submission makes reference to appropriate refuse and recycling storage being provided at ground floor level, but no details are provided on any of the submitted plans. This information needs to be provided and reviewed by officers before the application can be determined.

Construction Logistics Plan / Method Statement

It is understood that a Construction Logistics Plan / Method Statement was identified as a document to be provided at the application stage in the pre-application feedback provided by officers in September 2023. This has not been provided as part of the application and should be requested prior to determination.

Given the nature of the proposals seeking an extension on top of existing occupied properties, this document cannot be secured by way of condition; it should provide details which need to be considered carefully prior to the determination of the planning application.

The access to Primezone Mews to the rear should be especially carefully considered during any construction phase, as the only access to these properties is via the undercroft of Harcourt House. Access to these properties, including emergency, refuse collection, vehicle and pedestrian access, cannot be compromised or restricted, even for short periods of time, during any construction phase.

5. Summary

To conclude, the leaseholders of Harcourt House object to the planning application and have significant concerns about the negative impact of the proposals and that fundamental details are missing in this application. We would request that the following should be provided and reconsulted on to allow for a robust assessment and further public consultation of the proposals:

- updated drawings:
 - existing and proposed sections, plans and elevations should be revised to show existing flats, stairwells and communal areas, with correct dimensions throughout, and in accordance with the Council's planning application validation checklist requirements.
 - proposed sections and elevations should be revised to show the correct site levels and resulting finished floor levels;
 - existing and proposed floor plans of existing properties to be provided (and for any measures required to ensure compliance with requisite fire regulations shown);
 - existing and proposed floor plans of the ground floor to be provided (as details relating to refuse and recycling, and cycle parking provision are absent from the current submission);
 - proposed sections and elevations to be revised to show dimensions of proposed increase in height to raised chimney stacks (and for visual impact of these to be tested);
 - proposed sections and elevations to show requisite structure, services and how these details will be treated;
 - correct measurements of proposed balconies to be provided on proposed sections and elevations (and for these to be revised to comply with London Plan standards); and
 - floor plans of the proposed new flats demonstrating compliance with Approved Document Part M4(2).
- CGI to be updated and verified for accuracy;
- details of proposed materials for new and existing flats where alterations will be required;
- clarification about the ability of the proposed small, chimney stack obscured side windows to be openable (with reference to dual aspect definition);
- clarification of ceiling heights (with reference to compliance with residential space standards);
- significant additional details (including in existing flats) to demonstrate compliance with additional fire regulations resulting from the proposed extension, and consultation of this information by Haringey Building Control and the London Fire Brigade;
- full and proper daylight, sunlight and overshadowing assessment;
- full noise impact assessment; and
- Construction Logistics Plan / Construction Method Statement.

For the reasons set out above and as explained in this letter and its enclosures, it is considered that the submitted application contains a number of inaccuracies and missing information which means it cannot be determined in its current form. The leaseholders therefore have significant concerns about the potential impact on residential amenity, on surrounding heritage assets, on transport and construction impacts, and about the quality of the accommodation proposed. This additional information should be requested from the applicant and reconsulted on before the application is determined. If it is not provided, or if the details provided demonstrate non-compliance with the development plan, the application should be refused.

We would welcome the opportunity to comment further once the additional information has been submitted, and look forward to being kept up to date with the application's progress.

Yours sincerely

A handwritten signature in black ink, appearing to read "Savills", written in a cursive, flowing style.

Diana Thomson

Director

Enc.	Appendix 1	Technical Note prepared by Ashton Architecture
	Appendix 2	Heritage Assessment prepared by Portico Heritage
	Appendix 3	Structural Report prepared by Akera Engineers