

Planning Service
London Borough of Haringey
L6 River Park House
225 High Road
Wood Green
N22 8HQ

23 May 2024

Dear Eunice,

Planning Application HGY/2024/0921 Erection of one additional storey at roof level to existing building to provide two self contained apartments, plant and associated works

I am an owner and resident at Harcourt House and I am writing to object to the above planning application in the strongest terms.

The objection is based on seven main categories:

1. **Overdevelopment & detrimental effect to the conservation area:** The proposed extension will not preserve or enhance the character and appearance of the conservation area and harm the setting of the adjoining locally listed buildings. The extension will make Harcourt House even taller and more dominant against the prevailing 2-3 storey height of the Victorian villas in the streetscape of the North side of wide Haringey Park.
2. **Loss of light, overshadowing, privacy and amenity:** The proposed extension will negatively impact the amenity of the existing residents of Harcourt House and neighbouring properties, such as increased overlooking, overshadowing and disruption during and after construction.
3. **Proposed design is not compliant with Building Regulations:** The proposed extension does not comply with a number of Building Regulations, such as fire and structure. To achieve compliance, future planning amendments will very likely be required.
4. **Proposal is not compliant with planning policies:** The proposed extension is contrary to National Planning Policy Framework. The proposed flats do not meet London Plan Housing Standards or Haringey's Local Plan policies.
5. **Inaccurate and misleading application information:** The application drawings have been drawn inaccurately, setting a misleading picture of the existing building and proposed plans. The true impact of the proposed extension will be much greater when proper survey of the existing building is carried out and the design is properly prepared and represented.
6. **Incomplete planning submission:** The application is missing critical information which allows it to be valid or determinable.
7. **Lack of consultation:** The application design has been developed over at least 5 years without any consultation with residents, leaseholders or local community before submission.

I expound my objections in detail below:

1. Overdevelopment to previously extended Harcourt House

- 1.1. Harcourt House is already the tallest building along the northern Victorian section of Haringey Park. The building was previously extended in the 1920s from two Victorian Villas. The proposed further roof extension will result in a building envelope and ridge line far higher than any adjacent buildings which are generally 3-4 storeys tall. This includes locally listed buildings in the conservation area. This is contrary to 2023 NPPF's policy that airspace development should "be consistent with the prevailing height and form of the neighbouring properties".¹



- 1.2. The proposed extension means Harcourt House will become 5 storeys tall and will be completely out of proportion with the 2 storeys mews properties at the North of Harcourt House, such as Primezone Mews, Pinehurst Mews and 21-24 Haringey Park. This would result in a 'canyon effect' as these mews properties would be hemmed in on multiple sides by 5 storeys Harcourt House and 6-7 storeys Town Hall apartments. The application drawings also fail to genuinely depict the relationship between Harcourt House and its context even though Haringey LPA's application validation checklist explicitly requires all sections and elevations to show neighbouring properties to each side.

2. Negative Impact on the conservation area and adjacent locally listed buildings

- 2.1. The proposal increases the height of Harcourt House to 5 storeys, which is incongruous with the 2-3 storey locally listed buildings at 13-15 Haringey Park. Although the proposal attempts to mitigate the visual impact of the roof extension by setting it back from the street facing front, the extension will remain clearly visible from the southern side of Haringey Park and from Sandringham Gardens.
- 2.2. The proposal raises the parapet of Harcourt House by 1-1.5m and removes the current stepped form to create a continuous line which will further emphasise the already disproportionately wide facade (~30m) against other neighbouring Victorian buildings. The proposal also creates a strange ~2m tall blank facade above the upper floor windows at 17 Haringey Park. This will make Harcourt House contrast even more with the neighbouring well proportioned and intricately detailed Victorian villas.
- 2.3. The proposed extension is asymmetrical, clad in metal and has metal windows. All are neither typical nor traditional and will not complement the existing host building, which has

¹ National Planning Policy Framework 2023 Paragraph 124(e)

Victorian proportioned traditional timber framed windows throughout. This will create dissonance and cause harm to the overall appearance of the conservation area.

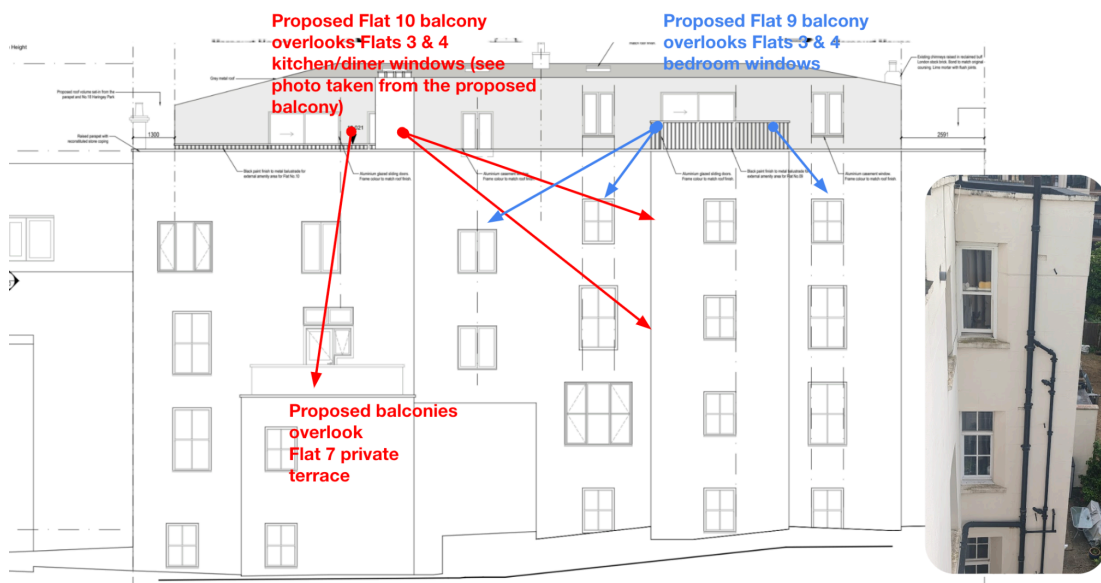
- 2.4. Planning application lacks sufficient details in the elevation drawings (such as cladding joints, fenestration and window details) to demonstrate the proposal will be of a high quality appropriate for the conservation area.
- 2.5. To summarise, the proposal will exacerbate the already dominating, wide and blank facade of Harcourt House, draw attention to the additional height of the proposed unusual and atypical roof extension, and will fail to "preserve or enhance the character and appearance of the conservation area", stipulated by the Planning (Listed Buildings and Conservation Areas) Act 1990, section 72(1).

3. Negative Impact on neighbouring properties

- 3.1. Given that Harcourt House is located south of Primezone Mews and Pinehurst Mews, adding an extra floor will obstruct southern daylight from reaching the habitable rooms and private gardens of these properties. A full and proper assessment of daylight, sunlight and overshadowing impacts should be provided to understand the full extent of the proposed extension's effects.
- 3.2. The proposed extension, particularly the new balconies, will materially increase overlooking into the habitable rooms and private gardens of Primezone Mews, Pinehurst Mews, and 21 Haringey Park. This will result in an unacceptable loss of privacy for the residents.
- 3.3. The planning statement by DLBP claims careful assessment of overlooking impacts on neighbouring properties. However, it incorrectly identifies 21 Primezone Mews as the building to the north. This address does not exist, unless DLBP is referring to a Flat 21 Primezone Mews. However this flat is significantly farther from Harcourt House than most other Primezone Mews flats, raising serious doubts about the thoroughness and accuracy of the overlooking assessment. Furthermore, the application completely omits 3 houses at Pinehurst Mews, located much closer to Harcourt House, Northwards. This, again, shows lack of thoroughness and proves a haphazard approach to overlooking assessment.
- 3.4. The proposed drawing CF-214-DR-0050-A (site plan and existing site sections) contains several inaccuracies. Notably, it incorrectly depicts garages at the back of Harcourt House, which were replaced by three private houses (Pinehurst Mews) two years ago. Additionally, site section (02) is misleading. Despite the section 'cut line' on the plan indicating a cut through the garden of the 2-storey 2 Sandringham Gardens, the section incorrectly depicts the taller Ravensdale Mansions instead and should be redrawn. It is also deliberately deceptive that the applicant's Architects chose to show Ravensdale Mansions, located some 30 metres from Harcourt House, rather than the closer and much smaller Primezone and Pinehurst Mews 20 metres away, to the North. To ensure a genuine assessment of the proposed extension's impact on neighbouring buildings, the section should be updated to depict Primezone and Pinehurst Mews, which will be mostly impacted.

4. Loss of amenity and privacy for existing Harcourt House residents

- 4.1. 7 out of 8 flats at Harcourt House lack private outdoor space and rely on access to the communal gardens to the north of the building. The proposed extension will overshadow the communal gardens, impact their usability and desirability, resulting in the loss of crucial amenity for the existing Harcourt House residents. Both sunlight and daylight will be reduced.
- 4.2. The proposed extension, in particular the new balconies, will overlook the habitable rooms in Flats 3, 4 & 8, and the private terrace of Flat 7 in close distance (< 10m), resulting in the loss of privacy to the existing residents.



- 4.3. The applicant has failed to provide details on how noise and sound transfer from the proposed flats into Flats 4 and 8 will be mitigated. Additionally, no information has been given on how adequate sound isolation can be achieved within the proposed extremely shallow floor build-up. This lack of information raises concerns about noise pollution and disruption for residents in Flats 4 and 8, resulting in the loss of amenity for Flats 4 and 8, should the proposed flats were to be built

5. Roof extension as drawn is not buildable and does not meet Building Regulations

- 5.1. The proposed section (drawing CF-214-DR-1210-A) inaccurately depicts the new extension resting directly on the existing timber roof. This representation is misleading and very likely unbuildable, as the existing roof is designed for snow loading only. Structural support for the proposed extension would necessitate steel beams (approximately 400mm deep, as advised by our structural engineer's calculations²). Additionally, floor voids are required to accommodate drainage for the new bathrooms and kitchens, as they are not aligned with existing drainage stacks. The applicant must either demonstrate how these structural and drainage issues will be addressed within the proposed extremely shallow floor build-up or revise the section and other drawings/visuals to accurately reflect the actual structure and

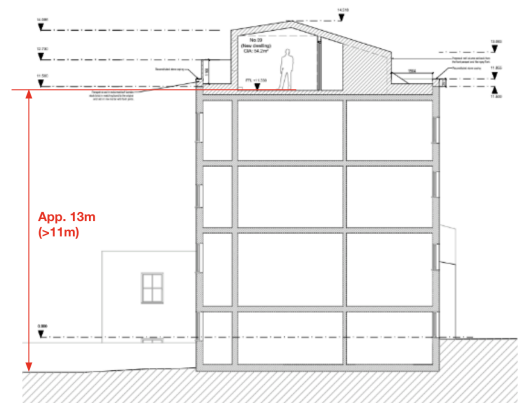
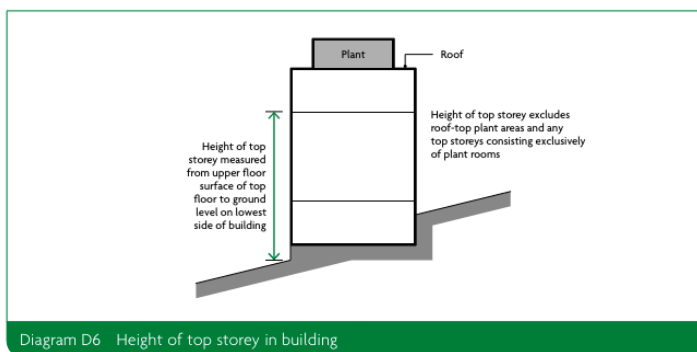
² Refer to section 3 in the structural report prepared by Akeru Engineers, dated 2 May 2024.

service zones. This will ensure a genuine assessment of the roof extension's visual impact can be made, and the application will not require further material amendments that are almost certain at this stage.

- 5.2. The proposed section drawing CF-214-DR-1210-A raises concerns regarding compliance with Building Regulations. The depiction of a ~0.5m deep landing for the new stairs to the 4F flats is not feasible and would violate Building Regulations AD Part K requirements. Additionally, the inaccurate representation of the existing stairs with ~0.5m deep landings suggests a lack of thorough surveying of the existing building prior to drawing preparation. Haringey Building Control should be consulted as part of the application determination to make sure the assessment is made on realistic and compliant design.
- 5.3. The proposed extended chimneys, including those with operating flues, do not appear to meet the height requirements stipulated in Building Regulations AD Part J. This non-compliance could lead to issues with smoke dispersal and potential safety hazards. It is crucial for the applicant to revise their drawings and ensure that the chimney design adheres to all relevant regulations and its visual impact to be understood.
- 5.4. The proposed location for the water tank above 16 Haringey Park presents significant safety concerns. Accessing the relocated tank requires traversing a narrow, approximately 1-metre wide walkway without any edge protection. This configuration contravenes both Health & Safety legislation and Building Regulations AD Part K, which mandate the provision of safeguards to prevent falls and ensure safe access for maintenance and inspection. It is imperative that the applicant incorporates appropriate edge protection and depicts them in the planning drawings and visualisations so its visual impact can be understood and evaluated.

6. Proposal factually does not meet Building Regulations and will compromise the safety of the existing residents

- 6.1. The proposed development, in its current form, fails to comply with several Building Regulations. These non-compliances necessitate alterations to the layout and appearance of the proposal which are planning matters.
- 6.2. The extended building will be >11m and >4 stories (see diagrams below) and will trigger the need for 'building-wide' changes to meet the new Building Safety Act. Sprinklers, smoke vents and protected fire lobbies will be required to meet the latest Building Regulations AD Part B.



- 6.3. The proposals fail to provide design details on how these additional fire safety requirements triggered by the extension will be met. Haringey Building Control should be consulted as part of the application determination to make sure the assessment is made on realistic and compliant design. To illustrate, some of the requirements are:
- 6.3.1. **Sprinklers** - No details have been provided on how the applicant intends to comply with Building Regulations AD Part B to install sprinkler systems retrospectively in all existing flats which are already occupied. Plant facilities for the future sprinkler system are not considered and shown on the proposed drawings.
 - 6.3.2. **Smoke vents** - An automatic smoke vent is required at the top of the stairs to meet Building Regulations AD Part B. Smoke vents are not discrete, cannot be flush mounted and will therefore impact the appearance of the proposed roof extension.
 - 6.3.3. **Protected fire lobbies** - The extended building will no longer be deemed as a 'small single stair building' according to Building Regulations AD Part B1 (Paragraph 3.28) so protected fire lobbies will be required on each floor for compliance. The current planning drawings do not show any protected lobbies for the proposed new flats, nor do they contain any existing and proposed drawings to demonstrate changes for protected lobbies to be introduced on the existing floors.
- 6.4. As confirmed in the applicant's Design and Access Statement and Heritage Statement, Harcourt House was already extended from 2 Victorian villas in the 1920s. A significant portion of the building continues to rest on the original Victorian foundations, yet the applicant has not provided details on how the existing structure will accommodate the proposed further extension. This omission is a significant planning matter, as excavation and underpinning will likely be necessary to reinforce the existing Victorian foundations to support the proposed development. Furthermore, due to the constraints of working within a building containing occupied flats, additional external structures may be required to bolster the external masonry walls during construction. To address these concerns, the applicant must submit a comprehensive structural report detailing how they intend to support the roof extension while utilising the existing Victorian structures. This report should thoroughly assess and outline methodology and visual impact, as well as potential disruptions to existing residents and neighbouring properties. This will ensure that the full impact of the proposed development can be properly understood and evaluated.

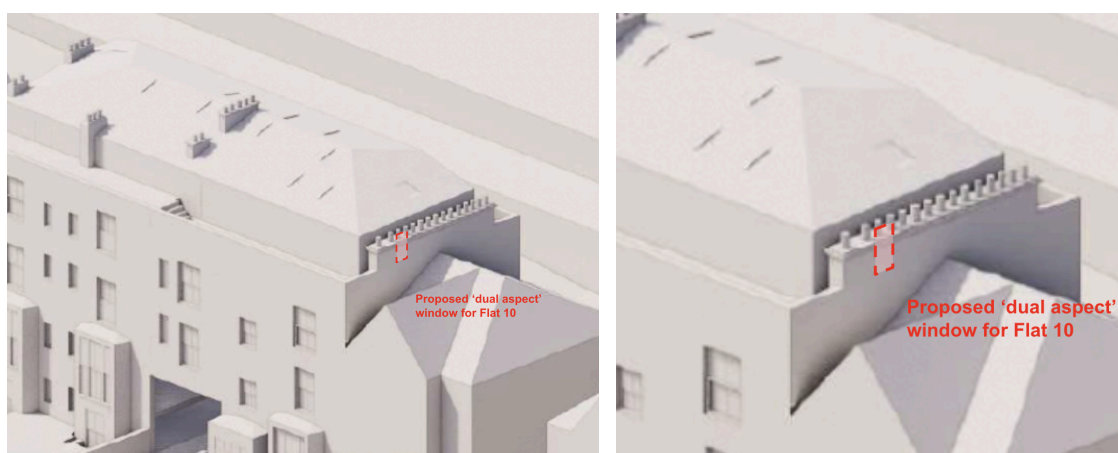
7. Proposed flats are not compliant with London Plan, and not aligned to Planning Policies

- 7.1. According to Haringey's Local Plan 2017 SP2, 90% of new homes must meet Building Regulations AD Part M4 (2), and 10% must meet AD Part M4 (3). While the applicant confirmed compliance with AD Part M4 (2) in their application form, they failed to provide supporting details as required by Haringey's planning checklist for all applications involving new homes. Furthermore, the submitted plans clearly demonstrate non-compliance with AD Part M4 (2). For instance, the plans lack level access to private outdoor space³ and insufficient clearance

³ Building Regulations Approved Documents Part M4 (2) 2015 edition incorporating 2016 amendments, Performance b, Page 10

for the principal private entrance⁴. Therefore, the applicant must revise their design and plans to ensure and demonstrate full compliance with AD Part M4 (2) to meet the requirements of Haringey's Local Plan, or mark the non compliance clearly on the application form.

- 7.2. The applicant's claim that the proposed two 1-bed flats will be dual aspect, as defined by the London Plan as one with *openable* windows on two external *walls*⁵, is inaccurate. The east-facing window of Flat 10 directly faces extended working chimney flues, necessitating that it be either fixed shut or removed altogether to comply with Building Regulations. Furthermore, even if this window were to remain, it looks out onto a blank wall and cannot be considered a genuine window, as illustrated in the markup on the applicant's Architect's 3D visualisation. This means the proposed flat is actually a single aspect North facing property, not allowed by the London Plan Housing Design Standards C4.1.



- 7.3. The proposed balconies fail to meet the minimum depth requirement of 1.5 metres as stipulated by the London Plan Housing Design Standards. When taking into account the brick parapet depicted in the applicant's section drawings, the actual usable depth of the balconies is only 1.2 metres.
- 7.4. The ceiling height will be less than 2.5m required by the London Plan Housing Design Standards if proper structure and services zones are shown as mentioned in paragraph 5.1 above. There also appears to be inconsistencies in the applicant's Design & Access Statement (page 23) which may suggest that less than 75% of the GIA for each dwelling achieves a floor to ceiling height of 2.5m. Flat 10 has reduced head height where the roof slopes to the east, but Flat 9 is not marked as having any reduced head height when the roof also slopes to the west. This is misleading and needs to be updated, to accurately reflect the proposed design.
- 7.5. The London Plan policy 7.2 "requires all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design which seek to ensure that developments can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances, and are convenient and welcoming with no disabling barriers so everyone can use them independently without undue effort, separation or special treatment". The proposed new flats will be on the 4/F and

⁴ Building Regulations Approved Documents Part M4 (2) 2015 edition incorporating 2016 amendments, 2.20, Page 16

⁵ London Plan Guidance Housing Design Standards June 2023 Appendix 3

the only means of accessing the flats will be via 7-8 flights of stairs. Lift access should be provided to comply with the London Plan.

8. Lack of consultation for the last 5 years

- 8.1. The planning guidance in the 2023 NPPF states that “early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community.”⁶
- 8.2. Though the applicant started the pre-application process in 2019, there was no attempt in the last 5 years to engage or consult with the residents, leaseholders or wider community who will all be significantly impacted by the proposed extension.
- 8.3. The applicant informed the owners via statutory notice ‘an application was made’ on 27 March as *fait accompli* when submitting the planning application to the Haringey LPA.

In addition to the objection points raised above, I would also like to highlight a number of missing information items in the planning application. The applicant must provide these in order for the application to be properly assessed and informed representations from the public can be made:

- Construction Logistics Plan / Method Statement - this document was requested by the planning officer multiple times at the pre-application stage, and must be provided as part of the full planning application to explain how the proposed construction will minimise disruption to the existing residents and neighbouring properties, and will not impact the only pedestrian, vehicle and emergency access to Primezone Mews which is partially under Harcourt House.
- Cycle and waste plans - planning application makes reference to 4 cycle parking spaces and refuse and recycling storage to be provided on ground floor but no details, such as existing and proposed ground floor plans, are provided.
- Full daylight and sunlight assessment - as noted in paragraph 3.1.
- Statement explaining Building Regulations AD Part M4(2) compliance for new homes as required by Haringey Planning application validation checklist.

⁶ National Planning Policy Framework 2023 Paragraph 137

In conclusion, Harcourt House is already the tallest along the northern section of Haringey Park, yet fitting into the streetscape. The proposed extension is non-contextual, inadequately designed, inaccurately drawn and will negatively impact the conservation area and the adjoining locally listed buildings.

The proposals demonstrably do not comply with the current Building Regulations, local and central government planning policies and will not do so unless significant changes to the design are made. The proposals will also result in unacceptable loss of light, amenity, privacy to existing residents and surrounding properties.

Additional evidence and analysis in support of my objection can be found in the reports and assessments prepared by the professional consultants team appointed by the leaseholders at Harcourt House:

- Objection letter by Savillis, the planning consultant
- Heritage assessment by Portico Heritage
- Technical note by Ashton Architecture
- Structural report by Akera Engineers

For these reasons I ask for this application to be rejected.

Many thanks,
Will Chan