

Planning Service

London Borough of Haringey

L6 River Park House

225 High Road

Wood Green

N22 8HQ

23 May 2025

Dear Ms Huang,

Planning Application HGY/2024/0921

I am a resident at Harcourt House and a registered Architect. I am writing to express my objection to the planning application HGY/2024/0921 second consultation for "amended plans":

1. Amended proposals are inaccurate, conflicting and introduce further omissions and inconsistencies, rendering the proposals unbuildable as drawn. Approving the application as drawn would mean knowingly accepting that future planning amendments will be required. Examples of conflicts and inaccuracies are:
 - a. Roof plan does not match sections and elevations.
 - b. Section through the proposed Flat 10's window does not match plans and elevations. If drawn correctly, this window will face a blank wall and chimney flues.
 - c. Roof access doors are ~1m tall and are therefore inaccessible and unbuildable.

Detailed markup of the planning drawings highlighting the conflicts and inaccuracies are appended to Richard Buxton's letter (Appendix 1B).

2. Proposals demonstrably do not comply with national, regional and local planning policies. Without repeating evidence already detailed in the previous objections, I would like to highlight the key policy non-compliances as below, all of which are supported by professional reports commissioned:

a. London Plan D6 (Housing Quality and Standards) and Housing Design Standards LPG

- The proposed Flat 10, and arguably Flat 9 as well, is single aspect and north facing with limited views - rooflights and window facing chimney flues do not count as an aspect, according to the Housing Design Standards LPG. Therefore the units do not meet London Plan D6 and LPG C4.1.
- The proposed units do not have step free access balconies, failing LPG C10.1.
- The proposed units may not meet the requirement where 75% of GIA needs to be >2.5m if the roof plan is drawn according to the elevations - see point 1a above.

b. London Plan D7 (Accessible Housing)

- The proposed units are on 4/F (fifth storey). London Plan D7 3.7.6 specifically highlights exemption for lift provision can only apply to buildings of four storeys or less.
- The proposed units are evidently non compliant with Part M4(2), despite being declared as compliant by the applicant in the application form.

c. Haringey Development Management DPD DM4 (Provision and Design of Waste Management Facilities)

- The plan to place unenclosed wheelie bins in the existing landscaped garden without paving is unsightly and presents health and safety concerns for residents. This contravenes policy DM4, which requires waste facilities to be screened and located to prevent nuisance and negative impacts on visual and other amenities.

d. Haringey's Local Plan Strategic Policies SP4 (Working Towards a Low Carbon Haringey)

- The applicant's energy statement claims higher carbon savings from the proposed PVs than achievable, which are demonstrably 50% lower¹ (180 kgCO₂e per flat). This discrepancy means the proposal may fail to meet the Local Plan Strategic Policies SP4 requiring a 20% onsite renewable energy target.

e. BRE Daylight and Sunlight Guidance, London Plan D6 and Haringey's DPD DM1:

- The submitted daylight and sunlight assessment for the proposed development is inadequate. It fails to comprehensively analyse the daylight impact on several private gardens north of the proposal, most notably the communal gardens of Harcourt House. These communal gardens are the only outdoor amenity for the existing 2-3 bed family units. "In the absence of such studies the currently submitted documents relating to daylight / sunlight are not considered to be comprehensive or meet the requirements of the BRE document or policy DM1."²
- The applicant's daylight and sunlight assessment shows that the proposed roof extension will reduce sunlight in the private garden of 1 Primezone Mews below BRE guidance levels. Given that Harcourt House's communal gardens are closer to the building, it is highly probable that they will experience similar or even greater reductions in sunlight.

3. The proposed development raises significant concerns regarding its compliance with essential Building Regulations, the Building Safety Act, and Health & Safety Regulations. Approval of the current plans would likely necessitate future planning amendments to address these deficiencies. Key areas of non-compliance include:

- Fire Safety:** The proposal appears to contravene Building Regulations AD Part B concerning the installation of sprinklers, protected lobbies, and automatic opening vents, which are required due to the building's increased height (over 11 meters).
- Structural Safety:** The proposal disregards structural safety measures, specifically the requirement for horizontal and vertical ties to prevent disproportionate collapse in an extended building of this height (5 storeys)³, against Building Regulations AD Part A.
- Chimney Flues:** Proposed kitchen window for Flat 10 faces onto active chimney flues. Proposed rooflights are also in close proximity with extended chimney flues, potentially contravening Building Regulations AD Part J.
- Buildability:** The proposal lacks any details or allowance for the necessary structure for the roof extension. A structural report⁴ indicates that steel beams with a minimum depth of

¹ Cook and Cardenas - Energy Strategy Review and Non-Compliances, 23 March 2025 (Appendix 3)

² EB7 - Daylight & Sunlight Assessment, 20 May 2025

³ Akera Engineers - Section 1, Structural Assessment, 2 May 2024

⁴ Akera Engineers - Section 3, Structural Assessment, 2 May 2024

350-400mm will be needed, which are not currently accounted for in the plans.

- e. **Future Access & Maintenance:** The proposal fails to provide a safe method for accessing the roof for routine maintenance and inspection of water tanks, chimneys, and PVs. The addition of compliant safety barriers will negatively affect the building's appearance as viewed from Haringey Park.

Although building control matters typically fall outside the scope of planning, the identified non-compliance issues will inevitably lead to material layout and external alterations to the proposals. Therefore, these regulatory concerns must be considered as part of this planning application.

- 4. Attached are appendices from a professional team's thorough assessment of the applicant's submission, which supports the following points raised:
 - a. **Appendix 1A** - A technical note from Ashton Architecture details discrepancies appended to Richard Buxton's letter.
 - b. **Appendix 1B** - A set of drawings markup highlighting omissions and errors in the amended planning drawings, appended to Richard Buxton's letter.
 - c. **Appendix 2** - EB7's Daylight & Sunlight assessment highlights the complete absence of an impact assessment on Harcourt House's communal gardens, the sole outdoor amenity for family-sized apartments.
 - d. **Appendix 3** - Cook & Cardenas' Energy & Sustainability assessment indicates that the carbon emission and onsite renewable energy targets cannot be achieved.

In conclusion, we maintain our strongest objection to the amended planning application HGY/2024/0921. The proposals demonstrably fail to comply with multiple national and regional planning policies regarding building form and massing, conservation, the design and accessibility of the new flats, waste management, daylight and sunlight impact, and sustainability. Additionally, fundamental concerns regarding compliance with Building Regulations, the Building Safety Act, and Health & Safety Regulations remain unaddressed.

The revised proposals fail to adequately address our previously raised, valid concerns and non-compliances. Furthermore, the amended plans contain inaccuracies, inconsistencies, and omissions, rendering them unbuildable as drawn and necessitating future planning amendments.

Our professional team's assessments, detailed in the attached appendices, provide clear evidence of these deficiencies. Approving this application in its current form would be contrary to established planning policies and would knowingly accept the need for future planning amendments. For these compelling reasons, we urge the London Borough of Haringey to reject this planning application.

Yours sincerely,
Will Chan