

Planning Service

London Borough of Haringey

L6 River Park House
225 High Road
Wood Green
N22 8HQ

5 Aug 2025

Dear Ms Huang,

RE: Planning Application HGY/2024/0921

We are writing to reiterate our strongest objection to the planning application HGY/2024/0921 for the proposed additional floor at Harcourt House. Despite multiple revisions over 16 months, the July 2025 submissions continue to be fundamentally flawed and fail to address the significant concerns we and our professional team have repeatedly raised:

- **Non-compliance with Core Planning Policies and Standards:** The proposed units violate critical London Plan design standards regarding aspect, daylight, accessibility including level access, and mandatory minimum ceiling heights.
- **Unacceptable Impact on Neighbouring Amenity:** The development will cause significant nuisance and loss of amenity due to inappropriate waste management, overlooking, and unacceptable overshadowing beyond BRE standards, especially impacting neighbouring gardens and existing residents.
- **False and Unreliable Sustainability Statement:** Version four of the sustainability statement continues to be flawed, containing incorrect SAP10 basis for calculations. Critically, it proposes 0.00 tonnes of CO2 reduction from on-site renewable energy sources, thereby failing to comply with London and Haringey planning policies.
- **Persistent Inaccuracies and Inconsistencies:** The submitted drawings and supporting reports remain riddled with errors, inconsistencies, and misleading information, making a proper assessment of the application impossible.
- **Unbuildable Designs and Regulatory Breaches:** The plans are unbuildable as drawn, structurally unrealistic and design disregards fundamental Building Regulations and Health & Safety requirements, including those related to fire safety, structural integrity, and safe access for maintenance. If made safe, the design would necessarily be different.
- **Planning Flexibility:** The applicant's arguments for employing flexibility to address the above are misguided, as the scheme fails on numerous material planning considerations beyond those where flexibility can be considered.

In essence, the proposed development fundamentally fails to meet established planning policies and regulatory standards across multiple domains. The repeated submissions of flawed and unbuildable designs is unacceptable and undermines the integrity of the planning process.

We strongly recommend that the London Borough of Haringey reject planning application HGY/2024/0921 promptly and definitively. Our primary objections to this application are detailed on the following pages.

1 Proposals are against multiple planning policies and standards

1.1 Poor standard & quality of accommodation

- **Single-aspect, north-facing units:** The applicant has now effectively conceded in the latest response to the council that the two new-build units cannot be considered dual aspects. London Plan requirement states:

*"Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces; **should not face north**; and must demonstrate that the units will: have adequate passive ventilation, daylight and privacy; and not overheat (particularly relevant for south or west-facing single aspect units)."*

The applicant's consultant incorrectly references a Havering development appeal as justification for accepting single-aspect units. This is misleading because, in that 96-unit scheme, 71% of units were dual-aspect, and the remaining 21% faced west or east, aligning with London Plan design Standard D6 exceptions for single-aspect units. In contrast, Harcourt House proposes 100% new-build flats that are single-aspect and North-facing, a design explicitly forbidden by London Plan design standard D6 and further clarified in LPG C4.1.

Additionally, no evidence of adequate passive ventilation (there will be multiple active flues preventing most of the proposed openings to be operational and openable) or any evidence to demonstrate adequate daylight. A "note" from their consultants, falls short of evidence.

- **Ceiling heights do not meet London Plan:** After we pointed out the errors in the applicant's initial and updated roof plans, their drawings were revised once more. Consequently, their planning consultant now admitted that Flat 9 does not satisfy the London Plan's minimum space requirements. Less than 65% of the flat's Gross Internal Area (GIA) will have a ceiling height greater than 2.5m, which is considerably below the 75% threshold stipulated by London Plan D6. As demonstrated in the applicant's drawings (see CF-214-DR-1230-B Proposed Section CC). Certain areas, such as the bathroom in Flat 9, will have significantly restricted ceiling heights (<2m), making the use of shower and bath facilities not possible.
- As highlighted in our previous objection letters, the proposed new units have a very limited outlook due to its single aspect nature and the need to minimise overlooking of adjacent residential properties. This, combined with previous points, means these units fail to meet key planning policies for high-quality accommodation, specifically London Plan D6 and Haringey's DPD DM1 policies.

1.2 Uninclusive Access

- **Lack of level access to new fifth-storey flats:** The proposed flats are situated atop a four-storey building, thereby triggering the London Plan D7 policy requirement for level access, without allowing exceptions due to the future height of the building of over four storeys:

*"In exceptional circumstances the provision of a lift to dwelling entrances may not be achievable. In the following circumstances – **and only in blocks of four storeys or less** – it may be necessary to apply some flexibility in the application of this policy:*

- *Specific small-scale infill developments (see Policy H2 Small sites)*
- *Flats above existing shops or garages*
- *Stacked maisonettes where the potential for decked access to lifts is restricted"*

The planning consultant's latest letter disingenuously attempts to redefine the concept of "storeys." They assert that Harcourt House's ground floor should not be counted as a storey, despite being only a few steps below entrance level, and the ceilings well above entrance level. To add, this argument overlooks the inconvenient fact that Harcourt House's floor heights are significantly taller than those in typical flats, a legacy of its Victorian villa past. Consequently, the new flats can only be accessed via 7 to 8 **full** flights of stairs, equivalent to a five-storey building.

Their attempt to cite a successful application in Redbridge as a precedent is irrelevant. The determination report for that case inexplicably omits any mention of D7 as relevant policy completely, and failures to meet these requirements were not raised during public consultation meaning the permitted exceptions to standard D7 for buildings of three storeys or less were not even considered. Therefore, that planning application should not be viewed as a relevant example for demonstrating flexibility in decision-making.

- **Part M4(2) Non-compliances:** The units demonstrably fail to meet M4(2) requirements, as highlighted in Ashton Architecture's technical note¹ and our previous planning objection letters. For example, the proposal lacks level access to private outdoor space² and insufficient clearance for the principal private entrance³. Most critically, the latest London Housing LPG 2023, which supersedes Part 2 of the London Housing SPG 2016, clarifies that the exception for not applying M4(2) and only applying M4(1) should be based on London Plan Policy D7⁴, which we have explained in detail above why it does not apply to Harcourt House. Therefore, M4(2) standards must apply in this instance, and there is no evidence that these new units comply other than a declaration in the application form by the applicant.
- Therefore, the proposed units are uninclusive, difficult to access, and fail to meet London Plan D7 and Haringey Local Plan SP2 policies, adding to the demerits of the proposals.

1.3 Unacceptable waste & recycling, creating nuisance and reducing green cover

- **Proposed bin store causing nuisance:** The proposed waste & recycling store for the new flats will cause nuisance to existing residents, remove an existing tree, bushes and landscaping. The revised version 3 of the bin store for the new flats will be positioned directly outside the living room windows (the sole windows for the living room) of flats 5 and 6 at Harcourt House. This will cause significant nuisance and harm to existing residents due to visual impact, smell and noise currently not experienced by the residents.

It is unacceptable that the outlook from an existing living room will now be a bin store instead of trees, bushes and garden landscaping. This arrangement contravenes London Housing Design Standards LPG B6.3: *"When located within the footprint of a residential building, the waste and recycling room should be designed and positioned to minimise the impact of noise and smell on the*

¹ Ashton Architecture Technical Note, May 2024

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

³ Building Regulations Approved Documents Part M4(2) 2015 edition incorporating 2016 amendments, 2.20, Page 16

⁴ London Housing Design Standards LPG 2023 C1.1

occupants." and would not be permitted in any circumstances for any new build developments.

- **Propose bin store reduces greenery and existing amenity, increases overlooking:** Furthermore, the placement of the bin store necessitates the removal of an existing 3m tall tree, hedges, and landscaping, which also violates Haringey's policy DPD DM1(C) regarding the requirement for development proposals to "respond to trees on and close to the site". The said landscaping provides passive privacy shielding for overlooking from the street and neighbouring properties across the street. The new bin store will remove this privacy shielding and expose the flats to overlooking.

It will also reduce net biodiversity habitat, against London Plan H2 policy of "principle of no net loss of overall green cover"⁵. To add, works to trees in a conservation area require an Arboricultural Impact Assessment and Method Statement to be submitted, and this has not been provided. The original application did not contain landscape and other relevant impact assessments as no ground level changes were proposed. This is no longer the case and these mandatory planning documents must be provided before impact of the proposal can be assessed.

Existing



Existing bins
discreetly hidden
away

Proposed



New bin store (4 bins) in
front of Flat 5 and 6
living room windows

Diagram 1 - Comparison between existing and proposed front gardens introducing the proposed new bin store

- Therefore, the proposed waste management design is unsuitable and unacceptable. It fails to meet key planning policies, specifically the London Housing Design Standards LPG B6.3 and Haringey's DPD DM1 policies. Other potential impacts are not yet known due to missing information.

1.4 Unacceptable impact on neighbouring amenity, including loss of light, overlooking and overbearing

- **Sunlight impact on the communal gardens beyond BRE standards:** The proposed development would significantly reduce sunlight in the gardens of 17 Haringey Park (Flats 5-8 Harcourt House), falling well below permissible BRE standards. The applicant's report indicates a drastic 60% reduction in sunlight, from 8% to 3%. This communal garden is the only outdoor space available to the family-sized units (Flats 5, 6, 8) at Harcourt House. London Plan LPG B9.5 states:

⁵ London Plan 2021 Policy H2 4.2.10

"Maximise the quality and availability of daylight and sunlight in communal outside spaces, particularly in winter. It is particularly important that spaces designed for frequent use (including sitting and play spaces) receive direct sunlight through the day, particularly at times they are most likely to be used."

It is crucial to clarify that the flats at 17 Haringey Park do not share the communal gardens with 16 Haringey Park (Flats 1-4 Harcourt House). These gardens are separate, divided by fences and the access road to Primezone Mews. For the avoidance of doubt, Flats 5-8 do not have access to the communal gardens of Flats 1-4. The applicant's attempt to combine sunlight results from these distinct areas to mask the development's impact on 17 Haringey Park's garden is misleading. This deprivation of sunlight to the sole outdoor space for 17 Haringey Park's family-sized units (Flats 5, 6, 8) is indefensible.

Furthermore, the applicant has previously admitted that the proposed development will also reduce sunlight to the private amenity at 1 Pinehurst Mews beyond BRE standards.

- **New excessive overlooking of neighbouring properties and amenities:** The proposed development, and in particular, the proposed balconies, re-introduces an unacceptable increase in overlooking of neighbouring private properties and amenities. Following public consultation, and multiple planning objections regarding loss of privacy, the case officer requested privacy screens for the new balconies. These screens have since been partially removed, reintroducing overlooking, particularly onto Flat 7's private terrace at Harcourt House. This alteration seems to be an attempt to somewhat improve otherwise poor outlook from the flats, indicating that the current designs are flawed and cannot adequately address both privacy and outlook concerns simultaneously, causing harm for little gain.
- **Overbearing and out of scale:** The proposed five-storey extension to Harcourt House would be disproportionate to the two-storey mews properties to its North (e.g., Primezone Mews, Pinehurst Mews, and 21-24 Haringey Park). This increase in height, combined with the 6-7 storey Town Hall apartments, would create a "canyon effect," leaving the mews properties hemmed in on multiple sides.
- Therefore, the proposed development will negatively impact the amenity of existing residents at Harcourt House and neighboring properties, such as Primrose Mews and Pinehurst Mews. Most critically, it will lead to a detrimental loss of light for the sole communal garden at 17 Haringey Park (Flats 5-8 Harcourt House). This contravenes London Plan LPG B9.5 and Haringey's DPD DM1(D) policies.

1.5 Energy & Sustainability - confused and unreliable Sustainability/Energy Statement

- Despite the submission of four versions to date, the latest Sustainability Statement remains inaccurate and confusing, failing to demonstrate compliance with planning policies. Our energy consultants have provided a detailed critique appended to this objection letter, but the key issues are summarised as follows:
 - The floor areas of the flats (63m²) used in the SAP calculations are still wrong and inconsistent with the actual proposed units (53 & 54m²). Furthermore, the proposed materials, glazing, and roof areas for the SAP input are all incorrect. This makes it

- impossible for the council to properly assess the development's adherence to planning policies as the energy demand modelling is flawed.
 - The on-site PV generation energy has been overstated by 35% to 40% compared to industry standards, without any substantiation for such high efficiency. This is particularly implausible given that the proposed PVs are north-facing and not self-cleaning.
 - Despite the exaggerated output claims, the applicant's sustainability report concludes that PVs will not contribute to CO2 emission reduction, recognising the issues: *"The study proved that PV was the best option. **However, with site restraints, conservation issues and the low yield of the PV, this has been discounted.**"*⁶
 - Consequently, the CO2 emission reduction calculation has attributed zero contribution towards the Be Green requirement for on-site renewables.
- Therefore, the sustainability statement is incomplete, unreliable and does not provide evidence to demonstrate compliance with Haringey's DPD DM21 and London Plan SI2 policies, specifically 20% CO2 emission reduction by on-site renewable energy sources, such as PVs.

1.6 Design & Heritage - negative impact on the Crouch End Conservation Area

- 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. As we have pointed out multiple times and supported by our heritage consultant, Portico Heritage, and the Crouch End Neighbourhood Forum, the proposed further roof extension will result in a building envelope and ridge line considerably higher than any adjacent buildings which are generally 3-4 storeys tall. This is contrary to the NPFF policy that airspace development should *"be consistent with the prevailing form of neighbouring properties and the overall street scene"*.⁷
- We acknowledge the support of Haringey's conservation officer for the proposed development. However, the height and form of the scheme remain a highly sensitive matter due to the site's location within the conservation area. In the next section of this document, we have explained that the proposed scheme is not buildable because of inaccurate and misleading information, such as the unrealistically shallow floor build-up explained in the next section, missing automatic opening vents at the top of the stairwell. This will ultimately necessitate planning amendments, including a taller structure, higher chimney flues, additional maintenance equipment, fire measures all of which will exacerbate the proposed development's impact on the conservation area.

2 Unbuildable designs as drawn

2.1 Impossible structural and floor buildup

- The proposed ~150mm floor buildup resting directly on the existing timber roof structure is structurally unsound and fantastical. Structural engineer, Akera Engineers, advised in May 2024 that an independent steel structure with a minimum depth of 350-400mm is required⁸, not accounting for sound insulation and service transfer clearances. Even though we have pointed this out on multiple occasions, the latest drawings remain unchanged and unbuildable. The applicant has provided no facts or details to the contrary.

⁶ Applicant's Planning Stage Sustainability Statement, PRV4, Page 5

⁷ National Planning Policy Framework 2024 Paragraph 125(e)

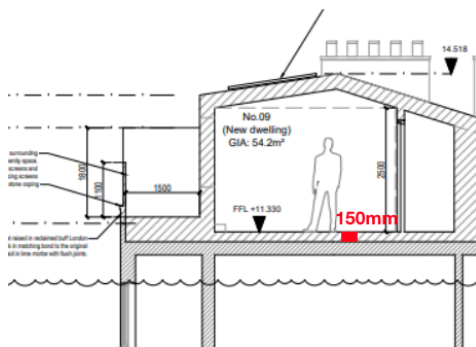
⁸ Akera Engineers - Section 3, Structural Assessment, 2 May 2024

- The applicant must be aware this buildup is unachievable, as demonstrated by drawings attached to their recent response letter to the council, which included a similar roof development in Redbridge by the applicant with a 500mm floor buildup (see Diagram 2 below), consistent with Akera structural engineer's advice. If their drawings were corrected, the proposed flats will either have further reduced ceiling heights, or the roof's envelope will need to be raised, or both, leading to further negative visual impact on the sensitive streetscape. This is a major concern for the conservation officer as shown in the pre-application refusals. The drawings must be updated to reflect a realistic buildup. Alternatively, since the facts exist only to the contrary, the applicant must share details of the "miraculous technology" that allows the roof extension to hover without structural support, achieve excellent sustainability and provide necessary under floor services.

Same Applicant (Upspace Construction Services) Rooftop Extension

Harcourt House

(150mm thick floor build-up, not buildable)
(4th Revision)



Lyndhurst Court, Redbridge

(500mm thick floor build-up, sent by applicant as an example)

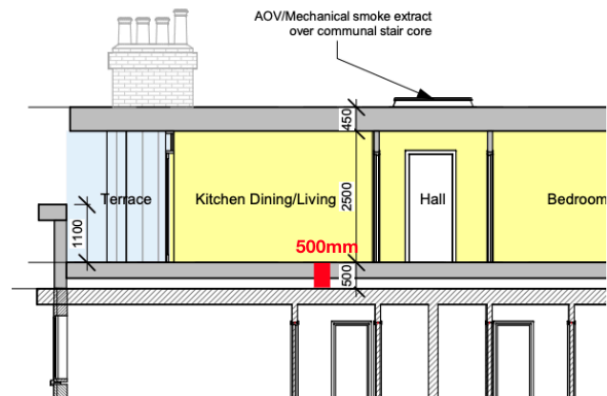


Diagram 2 - Extracts from the applicant's planning drawing and applicant's response to council letter in July 2025 of a similar roof development by the same developer Upspace Construction Services

2.2 Disregard of regulatory compliant and buildable designs

- **Fire safety:** As consistently emphasised by us and Ashton Architecture in their previous technical reports, the proposal appears to contravene Building Regulations AD Part B. This is especially true regarding the mandatory installation of sprinklers and associated plants, protected lobbies, and automatic opening vents at the top of the stairwell. These are crucial given the building's increased height (exceeding 11 meters). To date, no effort has been made by the applicant to demonstrate how the proposal will comply with these essential regulations. Most concerningly, advice sought from Haringey Building Control, obtained with the help from the ward counsellor, confirms the need for sprinklers, yet the applicant seems to disagree and has provided no evidence to justify such an exemption.
- **Structural safety:** As previously highlighted in Akera structural engineer's report, 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)⁹, against Building Regulations AD Part A. No attempt has been made by the applicant in the latest submission to demonstrate how the proposal could be compliant with the regulations.

⁹ Akera Engineers - Section 1, Structural Assessment, 2 May 2024

- **Active chimney flues:** As previously highlighted in Ashton Architecture's technical reports, the proposed living room window for Flat 10 faces onto active chimney flues. Proposed rooflights are also in close proximity with extended active chimney flues, contravening Building Regulations AD Part J.
- Our professional team has repeatedly confirmed and multiple reports submitted to the council that the proposal violates key building and safety regulations, and the applicant has provided no explanation or justification for these apparent discrepancies. While building control issues are not typically planning matters, the current proposal cannot be considered buildable. Approving it would necessitate future material planning amendments to rectify these issues. The applicant's apparent approach to circumvent upfront full assessment of the scheme's merit by not providing genuinely buildable and compliant design is unacceptable and should be challenged and refuted.

2.3 Disregard of future safe maintenance of equipment and installations

- **Unsafe design and impossible roof access:** The current proposal does not include safe access to the existing roof. The proposed doorway and corridor from the landing outside Flat 9 to the roof, at approximately 1 metre in height (see diagram 3 below - annotated 2), is unrealistic and unbuildable for safe passage. Additionally, the planning drawings do not illustrate any guarding, mansafe, or fall restraint systems to ensure safe access on the roof. These equipment will have visual impact and must be shown for proper assessment.
- **Disregard for design of future maintenance of extended chimney flues and PVs:** The proposal fails to address the future maintenance of both the extended active chimney flues and the proposed shallow PVs. No provision for safe access to the chimney flues is included, which would likely necessitate an external ladder and result in a negative visual impact.

Attached energy consultant's report indicates that the low angle of the PVs will prevent self-cleaning capability, necessitating frequent manual cleaning to achieve performance. Despite the applicant's sustainability statement mentioning "safe and secure access for maintenance purposes"¹⁰ under PV design considerations, the current plans lack any such provision. This omission must be rectified, and the visual impact of any such provision must be assessed.

- **Unusable water tank access hatch:** The applicant has reduced the proposed access door for the water tanks to less than 1m tall (see diagram 3 below - annotated 1) after we have highlighted its protrusion below the existing roof level. It is inconceivable this tiny access hatch will provide sufficient access for a sizable water tank serving five flats.

¹⁰ Applicant's Planning Stage Sustainability Statement, PRV4, Page 16

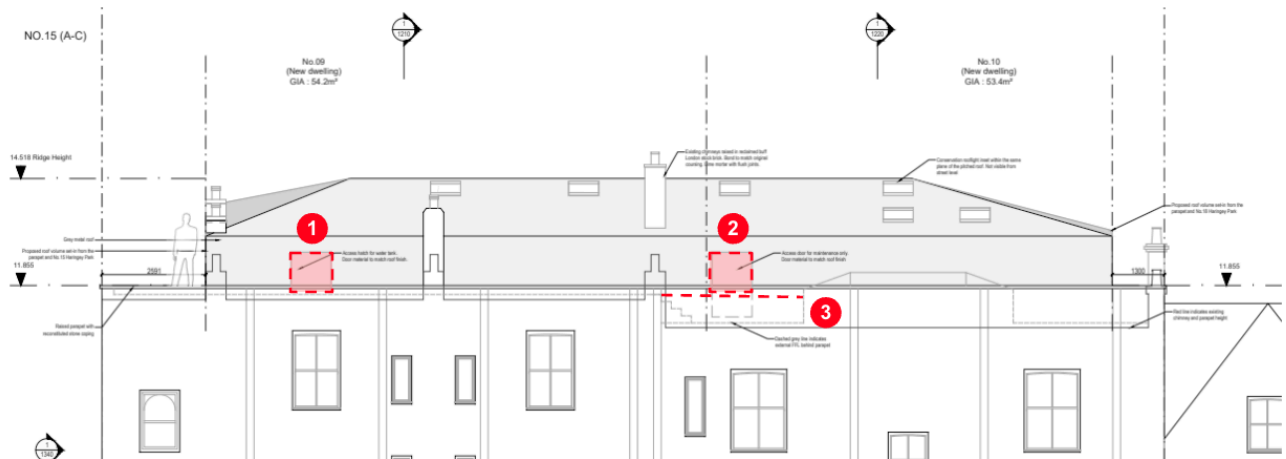


Diagram 3 - Extract from the applicant's latest planning drawings - CF-214-DR-1310-C (Proposed Front Elevation):

- (1) Proposed water tank hatch is ~1 m tall - not usable
- (2) Proposed doorway to access the roof is ~1m tall - not usable, not buildable
- (3) Proposed roof level incorrectly drawn on this elevation. The actual level is higher according to the plans.

3 Persistently wrong, inaccurate drawings, reports and statements

3.1 Inaccurate and inconsistent planning drawings after 2-3 revisions

- Even though the applicant has amended the planning drawings three times, and despite us pointing out the errors multiple times, the latest revision remains inaccurate and unbuildable as drawn. Examples are as follows:
 - The proposed plan, section and elevation are inconsistent. For instance, the chimney flues on the party wall with 15 Haringey Park appear in elevation and plan but are absent from section CC, as shown in Diagram 4. This discrepancy has been highlighted by us on three separate occasions.

Inconsistent elevation and section (2nd revision)

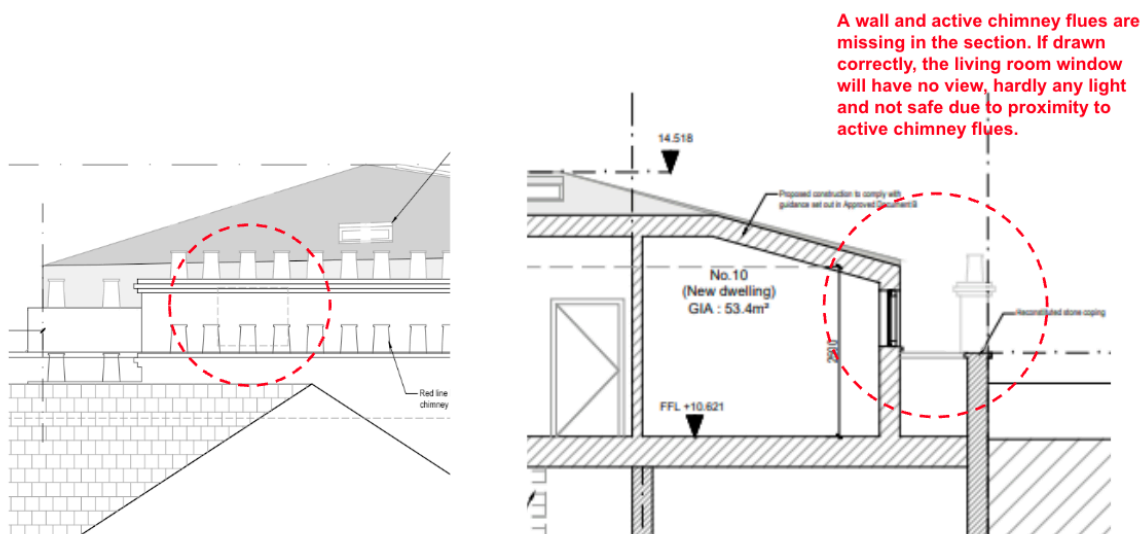


Diagram 4 - Extracts from the applicant's latest planning drawings - CF-214-DR-1330-C (Proposed Flank Elevation) and CF-214-DR-1230-B (Proposed Section CC)

- The proposed floor levels are illogical - According to the latest drawing CF-214-DR-1130-C, Flat 9's landing is at +11.330, yet the adjacent connected roof level is at +10.921 with no intervening steps. This is an impossible scenario in reality. (see diagram 3 above - annotated 3 - showing the correct roof level)
- Refer to the previously marked-up drawings submitted on 23rd May 2025 for further details. The majority of the highlighted inaccuracies and discrepancies in those drawings remain unaddressed.
- Given that this is the fourth version of some of the drawings, and these errors have been highlighted to the applicant on multiple occasions, these errors alone are sufficient grounds to reject the application. The onus to provide accurate and trustworthy information, to the best of their knowledge lies with the applicant. This appears to have been transferred to the case officer and concerned objectors and their privately funded teams of experts.

3.2 Outdated Design & Access Statement

- The proposed Design and Access Statement has not been updated since its first submission in April 2024. Following multiple updates to the design, drawings and reports over the 16 months, the Statement now contains multiple false statements and untruths which must be corrected. For example, the Design and Access Statement states that both new units will meet London Plan Housing Standards. However, following the updates to correct the drawings like roof plans, the applicant has now conceded that this is factually incorrect and Flat 9 will fall short of this requirement by a significant margin. The Design and Access Statement contains many further factual errors.

4 Planning flexibility

- To mitigate against the proposal's failure to meet multiple planning requirements and policies, the applicant continues to implore for flexibility in planning decisions in their response letter to the council. However, such flexibility, as per NPFF 130(c), is specifically limited to "daylight and sunlight" aspects of the development. This flexibility should not, and cannot, extend to nearly every aspect of material planning consideration of this development, as noted above and in our prior objections. There is a clear limit to the flexibility that can be applied when a scheme consistently fails to meet fundamental requirements and standards.
- Furthermore, the applicant's claim that the scheme should be supported under London Plan Policy H2 which advocates for 'small house builder' schemes is misleading. Southern Land Securities, the company linked to the applicant, is in fact one of the largest residential freehold companies in the UK. Multiple Upspace development companies (a total of 19¹¹) have been set up. However, the nature, size or the intentions of the applicant are completely outside the scope of material facts on which an application's benefits, adherence to policy and potential for harm are to be considered.

¹¹ Companies House (<https://find-and-update.company-information.service.gov.uk/search?q=upspace>)

HGY/2024/0921 Harcourt House Roof Extension

Objection to "Further Amended Plans" July 2025

In conclusion, while we acknowledge the principle of well-designed and considered roof development is normally supported in planning terms, the numerous substantiated and significant demerits of the proposed development as detailed above—including poor standard of accommodation & quality, uninclusive housing, negative impact on neighboring amenity, and an incomplete/confused sustainability strategy—significantly outweigh any potential merits. Furthermore, despite council's cooperation, the repeated submission of proven inaccurate, unbuildable, and incomplete plans and required information, despite multiple revision opportunities, demonstrates a fundamental disregard for both the planning process, transparency and regulatory standards.

While Haringey has shown considerable patience, proactive solution based approach and cooperation with the applicant and their agents, a line must be drawn after 16 months of amendments. We respectfully request the Council to promptly reject this application definitively and insist that any future proposals are founded on genuinely accurate, compliant, and buildable designs of adequate quality for future occupiers as well as acceptable impact for future neighbours. Failing this, we request opportunities for further input and consultation in further cycles of updated information.

Many thanks,

Will Chan

Resident at Harcourt House

Appendix

Cook and Cardenas Energy Consultant

Further objection to the Sustainability Statement, 5 August