

Laurence Ackrill
Development Management
Haringey Council
River Park House
225 High Road
London N22 8HQ

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HGY/2020/1841 (the “Application”)

I object to the Application for the following reasons:

Planning Inspectorate Decision

The site in question has been the subject of previous planning applications which have been rejected.

In particular, by way of a decision dated 29 June 2018 (Appeal Ref APP/Y5420/W/18/3196614) (the “**Planning Inspectorate Decision**”), the Planning Inspector dismissed the applicant’s appeal thereby refusing planning permission for the site under the previous planning application (Application Ref HGY/2017/2182) (the “**2017 Application**”).

The public, including local residents, have a legitimate expectation that the Application will, as a priority, be assessed against both the 2017 Application and the Planning Inspectorate Decision. I would make the following observations:

1. In certain respects, the Application is no different to the 2017 Application and, in other respects, it is much more intensive than the 2017 Application. For example:
 - a. the Application proposes six dwellings whereas the 2017 Application proposed only three dwellings (in both cases, the dwellings would be “shoehorned” into a confined space within the site along the border with Barratt Avenue);
 - b. the Application proposes a development with a larger overall footprint as compared to that proposed under the 2017 Application; and
 - c. the “green” proposals under the Application (grass rooftops for the dwellings and gardens) were also proposed under the 2017 Application and, in any event, such proposals will not offset the harm which will otherwise be done to the site and the conservation area as a whole.
2. The Planning Inspectorate Decision put beyond doubt the significance of the site, including its contribution to the conservation area, and the harm which would be done to the character and quality of the conservation area. In particular, the Planning Inspector noted among other things:
 - a. the site’s “*historic form and layout*” (para 5);

- b. how *“the site also provides an important contrast to the bustle of the surrounding streets...is quiet and tranquil, providing a degree of spaciousness...[and how] the existing planting softens the site’s appearance, and provides a buffer between the buildings, promoting an ambiance of privacy and seclusion...[and that] all these attributes contribute positively to the significance of the conservation area”* (para 6);
- c. that the development *“would be at odds with the prevailing historic pattern of development in the conservation area, whereby the principal elevations of the houses face directly onto the street, rather than a secondary space”* (para 7);
- d. that the *“green roofs would not have the same visual quality as the garden land...[and although] the scheme would also provide landscaped gardens...the residential development would fundamentally alter the character of the site...and the character and appearance of the conservation area would be unacceptably harmed”* (para 8);
- e. that *“overall, the proposal conflicts with the overarching statutory duty as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, which must be given considerable importance and weight, and with the National Planning Policy Framework, which seeks to protect heritage and assets...[and] it would fail to comply with Policy SP11 of the Haringey Local Plan...and Policy DM1 of the Haringey Development Management DPD (DPD)...[and] it would also conflict with DPD Policy DM9 and Policy 7.8[, Policy 7.4 and Policy 7.6 of the London Plan]”* (paras 9 and 10); and
- f. that the *“[proposal’s] combined public benefits do not outweigh the harm...”* (para 13).

Thus, the Planning Inspectorate Decision provides a set of criteria against which the Application must be considered. It is clear that the Application does not address any of the objections or concerns outlined in the Planning Inspectorate Decision. Indeed, it proposes a development far more intensive than that proposed under the 2017 Application. For that reason alone, the Application should be rejected. It is also difficult to see how any development of this site would be compatible with the Planning Inspectorate Decision.

Other

The Application should also be rejected for the following reasons:

- **Garden land**: the site is garden land populated with mature trees and shrubbery (which would be cleared under the proposal) and there is a strong presumption against the development of such land (see also 2.b. and 2.d. above);
- **Overdevelopment**: the extent of the proposed excavation works and development would have an adverse impact on neighbouring properties also potentially resulting in ground movement/subsidence (in circumstances where some properties on the immediate surrounding streets are already suffering from subsidence), light pollution and noise pollution (contrary to Policy DM7, DM9 and DM18); and

- Privacy concerns: the proposed structures, due to their close proximity to neighbouring properties, would serve to negatively impact the privacy and amenity of neighbouring properties (contrary to Policy DM1) (see also 2.b. above).

As a public body, the planning authority must of course act reasonably and rationally in exercising its decision making powers and it would be both unreasonable and irrational to grant planning permission in light of the above and, in particular, the Planning Inspectorate Decision.

I would urge that the Application be rejected.

Yours sincerely

Kilian McConnell
27 Barratt Avenue
London N22 7EZ