

*Grange Cottage
8 Grange Road
Highgate
London
N6 4AP*

15 December 2024

Mark Chan
Senior Planning Officer
Placemaking and Housing
Haringey Council

Dear Mark

APPLICATION HGY/2024/1676 – 6A GRANGE ROAD, HIGHGATE N6

We wish to comment on some of the additional supporting documents commissioned by the applicants and loaded onto the Haringey website for this application since the beginning of November.

HERITAGE IMPACT REPORT

We are advised that it is normal for a heritage report to be commissioned at the beginning of a design process in order to inform the development of a design as it progresses. This however, is a late attempt to try to use selective information to justify a submitted design which has resulted in strong objections from local consultees, including the Highgate Conservation Area Advisory Committee, the Highgate Society and Highgate Councillor Emery. While the additional historical information is interesting, this report completely fails to address the main issue raised by every local consultee and Planning Inspector who has commented on recent 6a designs - that the proposals are too big for this infill site intended for a low roofed 2 storey building of 143 sqm. These plans, at 3-4 times that size are the largest yet, including those dismissed at appeal and as the objections have set out, represent material harm to the unique character of the road and the Conservation Area, in addition to the harm to the amenity of neighbours.

While the report refers to the large locally listed Victorian manor in the road, this does not mean that those dimensions are relevant for any other site. Yes, there are a variety of shapes, styles and designs along the road, but the settings are all different and this does not mean that any proposed dimension is automatically acceptable on any site. Nos. 8 and 10 are connected to The Grange manor house as they were built as ancillary service/accommodation buildings for servants and as such form part of the history of the

road, but most other properties are well spaced, particularly above ground floor level. For example, nos. 4 and 6 are single storey only on both their north and south sides. The siting, width and depth of the original 6a together with its low roof height, contributed to a similar stylistic variety between nos. 6 and 8 while maintaining daylight/sunlight to the windows of no. 6 to the north.

What we see here is a proposed building with massing that fills almost the entire space of the site, using the dimensions of The Grange and building lines of other properties on larger sites as a justification. As the drawings clearly show, it has a gable which reaches to the ridge height of uphill no. 8, with only a small step down to a roof height well above that of downhill no. 6. This is combined with spaces between it and both neighbours which are only the width of a 1m footpath and yet the 2 storey front bay stands in front of immediately adjacent no. 8 and at the rear, it extends well beyond the rear building lines of both neighbours and all previous designs on all 3 floors above or partly above ground. The result is a building form which seeks to eclipse its downhill northerly neighbour and to maximise and dominate rather than one which sits comfortably within its setting in this “semi-rural” road. It is anything but “proportional to the site”.

The report seeks to play down the fact that Grange Road is classified as “semi-rural” in the current Highgate Conservation Character Appraisal, probably because it recognises that this proposal would damage this character more than any other development on the road. While it may not appear as “rural” as many village lanes, its unmade surface, street trees, lack of formal pavements and variety of properties makes it an entirely unique setting in an otherwise suburban area. Such a profound misunderstanding of the setting of the site within the conservation area helps to explain how the design proposals for this over-development have progressed so far in the wrong direction. Grange Road’s difference should be celebrated, preserved and enhanced, not diminished by harmful attempts to overdevelop and create the same suburban grain as surrounds it. The proposed height and spacing would create an overall impression from the road of a gabled terrace with no. 8. The report claims a distinction as the eaves level of 6a would be marginally below that of no. 8, but this very marginal difference is unlikely to be at all noticeable from the road. These proposals resolutely do not preserve the character and appearance of this unique part of the Highgate Conservation area.

The two upper floors of the proposed building contain rooms sufficient to house 6 double bedrooms, a very substantial capacity and yet there is only parking for one car and the only useable outside rear garden space is a small pocket of grass at a semi-submerged level (in fact all main living space, apart from the entrance lobby and a small boot room is partly or fully below ground level). This massive imbalance of internal space to outside space is also a clear indicator of overdevelopment and at odds with the generous garden space of all surrounding properties.

And, while it may be true that the proposals would enhance the character of the Redington/Froggnal Conservation Area, Grange Road is in the Highgate Conservation Area.

ARBORICULTURAL IMPACT ASSESSMENT AND METHOD STATEMENT REV 2024 FINAL

We are pleased this revised statement now recognises the listed status of the Sycamore at the front of the site. As we have previously commented, the RPA of this tree and that of a Horse Chestnut at the front of our property together cover the entire width of the front of the 6a site and so any construction work here requires protection for these important trees

which are valuable contributors to the unique character of the road. We also note that the applicant is still intending to subsequently park on the Sycamore RPA and, that the basement plan has been amended again to restore the area cut out at the front of the basement to avoid the Sycamore roots. It is now proposed that the basement excavations will significantly encroach into the RPA of this tree.

All of these things are now recognised in the report and various protections are suggested, however given the stress that all of this will cause to this important tree, we request that the Haringey Tree Officer is asked to formally report on the appropriateness and practicality of these various protections and that no permission is given until he is satisfied that there will be no damage to these trees. We would also like him to address the mitigation work the report says is required on the trees in neighbouring rear gardens where roots have been damaged by the 2019 excavations on the 6a site. How is this requirement to be taken forward?

LETTER FROM OSM CHARTERED SURVEYORS (3/12/24) AND BRE CLIENT REPORT ISSUE 5 (6/12/24)

We understand that the applicant is concerned because the BRE daylight/sunlight report originally submitted with this application did not show the result required to obtain sign off on this issue, but the OSM letter adds nothing new and by definition, a report commissioned by an applicant is not an independent report. In addition, we see that this has now been superseded by Issue 5 of the BRE Client Report which includes loss of sunlight calculations for the side bedroom windows at no. 6.

We note the results of the new sunlight calculations. These show that these windows will both retain less than the required 0.8 of their annual probable sunlight hours, losing 18% and 19% respectively compared to a requirement for a reduction of no more than 4%. Although absolute minimum levels may be retained, these results indicate the proposed scheme will result in a very appreciable reduction in sunlight and this supports the VSL result that the room will appear unacceptably gloomier if this proposal goes ahead.

The fact, detailed in the original BRE report, that the proposal fails the primary VSL test in respect of these and other neighbouring windows, has not ceased to be the case. As the Inspector in APP/Y5420/W/23/3335808 made clear, the failure of the VSL test by itself, is enough to cause unacceptable harm to living conditions in breach of policy.

Although (per OSM) bedrooms may be less important than other living rooms (including kitchens), they are not irrelevant and a suggestion that occupants may not notice a reduction in daylight based on an alternative test, despite the failure of the VSL test and the results of the annual probable sunlight hours test is not good enough (and according to the planning inspector in APP/Y5420/W/23/3335808 likely untrue).

While writing we should also point out that the windows in our utility room roof facing 6a also fail the VSL test. Our kitchen relies on light from the utility room roof and it is clear from the drawings that this situation is made significantly worse by the first floor bay on the 6a master bedroom. The upper floor rear building lines must be moved back to the point at which there is no harm to the living conditions of either neighbour.

In addition, we note the Issue 5 report still relies heavily on the fact that the 2018 scheme would have resulted in an even worse impact on the living conditions of neighbours. However, as has clearly been explained at great length in comments submitted, the 2018 scheme is *not of any relevance here* because it is no longer extant and the drawings which supported that approval contained significant errors which understated the impact of the scheme on neighbouring properties.

SUMMARY

It is very disappointing that once again, instead of engaging positively with consultation comments to reach an appropriate resolution for this site, there has been a continued determination to push for size maximisation regardless of all comments and consequences.

While we agree that the site is temporarily making a negative contribution to the road and the Conservation Area, the approval and actioning of this proposal would cause much more damaging permanent and unacceptable harm to the Conservation Area and the amenity of neighbours. Grange Road is a unique place within the Conservation Area which must be protected.

Finally, although the CGI image of the proposal looking across no. 8 has been amended to reduce the boundary wall to its actual height, the high hedge that has replaced it also does not exist.

We await further information on the basement proposal but are assured that there are enough material issues relating to the above ground build to enable you to refuse this application and trust that you will do so.

Yours sincerely

Simon and Carolyn Purves

CC Matthew Gunning
 Elizabetta Tonazzi
 Daniel Monk
 Rob Krzyszowski
 Helen Evans
 Cllrs Emery, DaCosta, Isilar-Gosling