



HIGHGATE SOCIETY

10A South Grove, Highgate London N6 6BS

14th February 2025

Marc Chan,
Planning Department
London Borough of Haringey
River Park House
225 High Road,
London, N22 8HQ.

Dear Mr. Chan

New House 6A Grange Road, Hornsey, London, N6 4AP Application no HGY/2024/1676

The Highgate Society wrote on 13th August 2024 to object to the above application. This is a supplementary objection responding to further documentation submitted by the applicant since then. These documents include a Heritage Statement, a further BIA, a daylight response and arboricultural report. The Society has reviewed these documents and feels they do not address concerns previously raised and thus they confirm their continuing strong objection to this application. The reasons for this are set down below and refer to the newly submitted documents.

Basement Impact Assessment

The applicant has submitted a revised BIA by Creat. The Society has reviewed Volumes 1 and 2 of revision J of these reports but does not have the specialist knowledge to critique the technical aspects. However, the reports produced by Creat have been audited independently by Campbell Reith and reviewed by Alan Baxter Associates on behalf of the adjoining neighbours. Both reports conclude that the BIA is not satisfactory, and the Society supports this position, in particular, with Alan Baxter's statement that:

"..... it is our view that this latest revision of the BIA fails to address key requirements of the Haringey Development Management Plan- Policy DM18 and of the Highgate Neighbourhood Plan Policy DH7."

Section 6.30-6.32 of Volume 1 of Creat's BIA describe the extent of the garden retaining wall and indicate that this will not interfere with ground water flow. Section 7.7 goes on to say that *"A solitary, isolated basement which intersects the groundwater table is unlikely to affect the groundwater flows in the wider area: the water will simply flow around the obstruction,"* However this is not a solitary isolates basement as claimed.

The proposed basement, with the *"garden retaining wall"* fills virtually the whole application site and adjoins the basement covering the full site area of the adjoining no. 10 View Road development. The Creat report indicates *"potential waterflow"* as flowing from south to north. The combined basements and garden retaining wall form an impenetrable barrier. The evidence of the impact of this is already apparent by the constant ponding in the base of the garden excavation and the neighbour of no 6 who claims his garden has become arid.

The Creat report indicates that the ground water level is below the structure. However, it is immaterial whether the walls and slab are positioned above the ground water level or not. For one thing ground water levels fluctuate in accordance with the amount of rainfall.

Another issue is the impact of the excavation on biodiversity. Subterranean fauna is widespread in this area and includes representatives of many animal groups, mostly but not exclusively arthropods and other invertebrates. However, there is a number of subterranean vertebrates as well such as mice although they are less common. The concrete walls present an impenetrable barrier and this has the potential to disrupt and damage this vital part of the ecosystem.

In view of the above, the Society believes that it is imperative that, regardless of the extent of basement under the house, the garden retaining walls, their footings and the partial slab are fully removed from the site and that this is a pre commencement condition of any approval.

The documents also include a large attenuation tank which sits in the rear garden. Although it is recognised that surface water runoff has the capacity to surcharge the sewage system, it is felt a large attenuation tank in a rear garden space is not the way to address this. The attenuation tank, due to its limited ground cover further causes damage to the ecosystem and together with the extended basement, garden retaining walls and partial slab, leaves little subsoil remaining. The Society requests that this damaging solution be refused and the applicant advised to look at alternative SuDS measures which preserve and enhance biodiversity, such as swales and rain gardens.

Heritage Statement

The Heritage Report produced by the Heritage Practice is detailed in its assessment of the area but makes some unsubstantiated claims. The most serious of these is set down in section 2.6 of this report which states that

“... the built form along Grange Road is suburban in character with mature tree cover and soft landscaping to front gardens”

This suggest that Grange Road consists of relatively dense semi-detached houses, albeit with more generous landscaping than normal in suburbs, and that this justifies the proximity of the proposed house to the adjoining houses and its size. This claim is not substantiated by examination on site and the Society strongly disputes this. The character of the road is confirmed by the Haringey's Highgate Conservation Area Appraisal which states that Grange Road is “*semi rural*”.

The houses in Grange Road are, apart from one terrace, on the northeast corner, detached and relatively generously spaced from one another. If there is construction close to the boundary this is generally a single storey structure such as a garage.

No 6A Grange Road is an infill site as indicated by the numbering. The site is narrow, with the result, that to achieve a 6-7 storey house on this site, it is necessary to build to 3 storeys along the boundary for the entire length of boundary. This leave high and narrow gaps with the adjoining houses completely contrary to the semi-rural character of the road.

The Heritage Practice's summary at the end of the report makes a number of statements, which the Society would like to respond to as follows:

“The proposals are well designed and appropriate for their context...”

The Society would contest this statement strongly. Whilst views on design can be subjective, in this case the design is poorly resolved with poor use of materials, and does not, contrary to Heritage Practice's belief, reflect the context. The fact that this is an overlarge scheme crammed into what is essentially a narrow infill site in a semi rural conservation area does not reflect context. This is confirmed historically in the reasons given for previous dismissal of previous appeals or refusals.

“...reflect the built environment which the council found acceptable in 2012 and 2018”

The current proposals do not. The earlier approvals for the site were considerably smaller as illustrated by the floor areas given in the Society's previous objection. Previous schemes have also stepped back to reduce the scale of the building as viewed from the street and also to protect the

amenity of the adjoining neighbours. This scheme has chosen to ignore this, presenting a full 3 storeys onto the street.

“Taken as a whole the proposals will enhance the character and appearance of the Redington/Frogman Conservation Area”

The authors of the report have failed to attribute the enhancement to the Highgate Conservation Area. The proposed building is categorically not in the Redington/Frogman Conservation so the Society is at a loss to know how it will enhance it.

“The scale of the building will be proportionate to the site addresses the reasons for previous refusals.”

The reasons for dismissal of appeal or refusal are all consistent, being on the grounds of size, impact on the amenity of the neighbours and harm to the character of the Highgate Conservation Area. The current application does still not appear to address the reasons for previous refusals.

The Heritage Practice’s report fails to justify the current proposal for this overlarge building which will cause substantial harm to the Heritage Asset of the Highgate Conservation Area and is not offset by any public benefit. Thus, this development is in breach of clause 214 of the NPPF.

Arboricultural Report

The Highgate Society has already expressed its concern in its objection of 16th December 2024 about the impact of these proposals on site and neighbouring trees, particularly the protected sycamore which is an important heritage asset in the road. We are not convinced that the mitigations proposed in the revised arboricultural report will provide adequate protection and so our request that this application is formally reviewed by the Tree Officer is repeated here.

Daylighting Report

The original BRE daylight/sunlight report submitted with this application omitted to demonstrate that the scheme met the requirements. A further letter from OSM has been submitted but this adds nothing new. However, Issue 5 of the BRE Client Report now includes loss of sunlight calculations for the side bedroom windows at no. 6, previously missing from the original application.

The Society has two major concerns about the impact of the new building on the daylighting and sunlighting of adjoining buildings, in particular, no 6 Grange Road

The results of the new sunlight calculations show that the windows on the flank wall of no 6 will both suffer from a substantial reduction in their hours of sunlight which, bearing in mind the new house is a deep 3 storey building close to the boundary, is unsurprising. This will have an unacceptable impact on the amenity of the owners of no 6.

We then come onto daylighting. The BRE report is clear that the calculation indicate a failure of daylight as assessed on the VSL basis. The Highgate Society was involved in a previous appeal for a development in Stanhope Road (APP/Y5420/W/23/3335808) where the inspector was clear that a failure of the VSL test is, by itself, sufficient to cause significant harm to living conditions and is thus unacceptable.

Conclusion

For the above reasons, the Society feels this application still fails to reach the level for approval and confirms their strong objection.

Yours sincerely,

Elsbeth Clements BA, BArch (Hons), RIBA, CA, FRSA
Co Chair,
Highgate Society Planning Committee

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