

26 September 2024

WEA Planning
14 Windermere Rd
Islington
London
N19 5SG

Development Management,
River Park House,
225 High Road,
London
N22 8HQ

Dear Mark Chan,

Objection to the proposed development at 92 North Road, Hornsey, London, N6 4AA (Planning application reference HGY/2024/2217)

On behalf of our clients Alys Gibson and Tom Stingemore, we are writing to object to the demolition of existing ground floor rear extension, proposed new ground and first floor rear extensions, alterations to basement undercroft, removal of fireplace to interior at ground floor, refurbishment of existing house, lowering of rear garden terrace, redecoration of rear elevation at 92 North Road, Hornsey, London, N6 4AA ('the site'), as submitted under listed building application reference HGY/2024/2217, and request that the application be refused. Our clients are the owners and occupiers of the neighbouring property 90 North Road and strongly object to the extension and alterations in the manner proposed. The reasons and basis of objection are outlined below.

Heritage Impacts and Design

The site is within the Highgate Conservation Area, designated in 1967. The Highgate Conservation Area Appraisal and Management Plan (2013) provides a detailed assessment of the character of the area, including the following:

"The character of the Highgate Conservation Area is formed by the relationship of its historic pattern of development, its high percentage of buildings of architectural merit, its topography, its

green open spaces and distant views.”

Number 92 is group listed as a grade II listed building with numbers 94 and 96, which makes a positive contribution to the character and appearance of the conservation area, with particular significance to the history of the local area as a resting place for travellers to and from London. Number 92 is of particular interest as it is described in correspondence from Charles Dickens during his stays at the former inn, adding to the historical and local significance of 92 North Road.

Haringey Local Plan Strategic Policies (2017) detail the relevant guidance for conservation in the borough. Policy SP12 demonstrates that the council should ensure the conservation of the historic significance of Haringey’s heritage assets, their setting, and the wider historic environment.

The Development Management DPD (2017) also outlines various policies to guide development and alterations in the borough, in particular Policy DM9 concerns the management of historic environment. DM9 states that regarding Heritage Assets, development will be supported where it conserves and enhances the significance of a heritage asset and its setting. As this proposal neither enhances nor conserves the significance of the heritage asset and its setting, the proposal goes against the policies in DM9 and SP12.

The policy also makes clear that proposals for alterations and extensions to buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building. Given the materials proposed in the application and the Design and Access Statement are highly contemporary, the materials are not fitting with the surrounding conservation area and the listed host property. The height of the proposed ground floor extension is also raised above the height of neighbouring properties, making it a discordant addition which harms the appearance of the building and its setting. During the pre-application officers noted that *“the council were supportive in principle of the clearly contemporary design incorporating a fully glazed first floor conservatory-style extension and full height ground floor windows. They recommended that modern materials be used, such as metal cladding, to enhance the contrast between the new extension and the historic building. Traditional materials*

should be avoided". This advice contradicts the policies in DM9 and consciously tries not to complement the architectural style of the host property and its setting. Creating a distinction between extension and host property also contrasts the guidance given for extensions and alterations to dwellings in DM12.

In regard to enabling development, DM9 sets out that the LPA will approve proposals where it is the only viable means for securing the future of the asset affected, it is the optimum viable use for the building and supports all of the policies listed in DM9. As this building is not at risk and does not adhere to all of the policies listed in DM9 the LPA should refuse planning permission for the proposal.

The DPD also states that Heritage statements should explain how proposals will conserve, enhance or restore a heritage asset and its setting. In the Heritage Report accompanying the application, the risk to the heritage asset has been classified as 'no harm', this is the classification below 'less than substantial harm' which is defined as offering 'minimal enhancement'. From this assessment, the heritage report offers no enhancement and very little conservation for the heritage asset and its setting.

The LPA state that proposals should seek to reinstate original features of significance, which is the opposite approach that the LPA and this proposal is taking with the modernisation of the house, and removal of late 19th century and early 20th century fabric. Regardless of the non-originality of such fabric, these still represent historic features of the building and have intrinsic heritage value.

The LPA has provided guidance in DM9 outlining the necessity to modernise heritage assets in favour of sustainable retrofitting to make buildings more sustainable and energy efficient. The Design and Access statement and heritage report make no reference to any benefit for energy efficiency from the proposed development, therefore the modernisation of this property is not in accordance with the policies outlined in the DPD.

The London Plan (2021) policy HC1 establishes that development which affects heritage assets and their settings should respond positively to and protect the significance of the assets and their setting. Consideration needs to be given to mitigating impacts from development that is not

sympathetic to scale, materials, details and form. As indicated by the heritage report and design statement, this proposal does not respond positively or protect the heritage asset and setting. Instead removing some of the historic fabric and employing uncharacteristic materials and massing.

The NPPF (2023) also sets out key policies for the protection and enhancement of heritage assets. Paragraph 206 states that any harm to the significance of a designated heritage asset should require clear and convincing justification. The proposed extensions to the property do not justify the necessity of the works and removal of late 19th century walls.

Paragraph 208 of the NPPF outlines that a proposed development which leads to 'less than substantial harm' should be weighed against the public benefits of the proposed development. As outlined in the heritage report, this proposed development would result in worse than 'less than substantial harm', against the guidance of paragraph 208. The proposal will also have no public benefit to justify the development, as most of the work is to the rear of the building this will only impact future occupants and neighbouring properties, and not bring any greater public awareness or access to the building and its setting.

Paragraph 214 of the NPPF guides that LPAs can assess the benefits of a proposal which would otherwise be against planning policies if it is necessary to secure the future conservation of the heritage asset. As we have established, the heritage asset is not at risk and contravening the policies in both the NPPF and the DPD are not necessary.

There is a clear and strong policy basis that requires development proposals across the borough to be designed to a high standard. In conservation areas this requirement holds even greater weight, where development proposals should positively contribute to local character, and conserve or enhance these areas of heritage value.

The proposed metal and glass addition to the rear would be entirely at odds with the character of the building and the conservation area. Many neighbouring properties have been extended over the years. However, the extensions have been subservient to the host property and in keeping with the character of the conservation area. When properties in the area have installed new windows, efforts have been made to match the existing windows in design, proportions and

materials to preserve the character of the conservation area, in line with local and national policies. The scale and form of the proposed extension is very different to the prevailing features of neighbouring properties in the locality. The proposed materials and glazing are equally as unsympathetic. Given the weight that must be afforded to the protection of these designated heritage assets, there is no justification for the proposed extension that would outweigh the harm it would cause.

The proposed alterations and extensions fall well short of these policies and standards. It would be unacceptably incongruous and inappropriate with its surroundings and cause significant harm to the character and appearance of the grade II listed building and wider conservation area.

It is clear that there is no basis in policy to approve this application, and it should therefore be refused on grounds of harm to character and appearance of a heritage asset, in line with policies DM9 of the DPD (2017) and the relevant parts of the London Plan (2021) and the NPPF (2023).

The proposed development causes harm to the character and appearance of the area and does not respect the significance of the existing building, in particular the proposal results in no enhancements to the heritage asset and its setting. The application should be refused on design and heritage grounds.

Conclusion

The proposed development would bring harm to the character and appearance of designated heritage assets (the grade II listed building and conservation area) and the fabric and footprint of the grade II listed building. It would not enhance or conserve the heritage asset, would not form a subordinate addition, and negatively impact neighbouring amenities.

These are material heritage preservation considerations upon which significant weight should be placed. Indeed, the purpose of the planning system is to ensure that detrimental impacts of developments are fully considered, so that harmful development is prevented and positive development encouraged. The local planning authority should ensure that due regard is given to all of the impacts of a proposed development so that a proper decision is made.

Fundamentally, the proposed development cannot be supported in policy terms. **We strongly object to the proposed development, which the local planning authority should refuse.**

On behalf of our clients Alys Gibson and Tom Stingemore we thank you for your consideration of these comments. If you have any questions or queries about the comments in this letter, please do not hesitate to contact me at the details above.

Yours sincerely,

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William Avery MRTPI
WEA Planning