Radcliffes Sustainability

Energy and Sustainability Statement

Panorama Room, Alexandra Palace, London N22 7AY

October 26

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1.0 Executive Summary

1.1 This Energy and Sustainability Statement has been prepared in support of the planning application to the London Borough of Haringey (LBH) for the replacement of the Panorama Room at Alexandra Palace.

1.2 The proposal replaces the existing Panorama Room, a marquee erected in 2000 on the site of the palace's former south-west wing, with a new 1,463 m² events space. The new structure is a lightweight, semi-permanent building, structurally independent of the historic fabric and sitting behind the retained south colonnade. Planning permission is sought for a period of 10 years, as an interim solution pending a future heritage-led rebuild of the south-west wing.

1.3 The development is a major development. It has been assessed against London Plan (2021) Policy SI 2, Haringey Strategic Policies (2017) SP4 to SP6 and SP11 to SP13, and Development Management Policies (2017) DM9 and DM19 to DM26. Emissions have been modelled in IES VE (SBEM) against Approved Document L 2021, using SAP 10.2 carbon factors.

1.4 At the Be Lean stage, a high-performance fabric, low air permeability, heat recovery ventilation and high-efficacy LED lighting achieve a saving of −1.7% against the 15% target for non-residential developments. The shortfall reflects the GLA methodology and the constraints of the use and site, as set out in paragraphs 5.2a to 5.2e.

1.5 A district heat network is proposed within the Alexandra Palace grounds. No connection is available at present, so no Be Clean saving is claimed. The heat pump system has been future proofed to allow connection to the proposed network, in line with Policy DM22.

1.6 At the Be Green stage, air source heat pumps (ASHPs) provide all heating, cooling and hot water, delivering a 14.1% carbon saving. This falls 5.9 percentage points short of the 20% reduction from on-site renewables sought by Policy SP4 "where viable".

1.7 Solar photovoltaics (PV) is is not proposed because of its potential impact on the significance of the Grade II listed palace and its setting. Policy DM9 (paragraph 2.62) gives priority to the preservation of the heritage asset where sustainability measures and significance conflict. The case is set out in Section 5.

1.8 Residual emissions of 7.45 tCO_2/yr would ordinarily be addressed through Haringey's Carbon Offset Fund, under Policy DM21(D); any contribution would be discussed separately with LBH, subject to the Trust's agreement. The scheme follows a BREEAM-aligned approach proportionate to the replacement of an existing structure within a listed building, will be air quality neutral and will manage surface water in line with Policies DM24 to DM26.

2.0 Introduction

Background

2.1 The Panorama Room is located within the retained shell of the south-west wing of Alexandra Palace, behind the south colonnade and the Southwest Tower, facing the south terrace.

2.2 The proposed replacement of the existing Panorama Room will enable the Palace to provide high-quality events space and retain and enhance commercial revenues to support the Trust's charitable objectives.

2.3 The proposed space comprises a single-storey event space including a main event area, entrance & lobby, bars, cloakroom, a catering kitchen, WCs, dressing rooms, a production office, storage, service areas and plant.

2.4 The structure is a lightweight, semi-permanent solution. Planning permission is sought for a period of 10 years. It is an interim structure, intended to bring the south-west wing back into use while a future heritage-led rebuild of the wing is developed. At the end of the consent period, the structure can be dismantled without harm to the historic fabric.

2.5 The existing marquee has significant operational shortcomings, including winter draughts, inadequate thermal comfort, water ingress and reliance on supplementary heating. The Trust reports expenditure exceeding £10,000 plus VAT on kerosene for heating last winter, with associated emissions reported as approximately 25.4 tonnes of CO_2 between mid-November and mid-January. Replacing this enclosure with an insulated building incorporating efficient electric heat pumps is intended to improve comfort and reduce reliance on temporary fossil-fuel heating. These operational records provide context for the replacement project; they are not directly comparable with the standardised annual SBEM results presented in this statement.

Heritage and Site Context

2.6 Alexandra Palace is Grade II listed and on Historic England's Heritage at Risk Register. It lies within the Alexandra Palace and Park Conservation Area and partly within a Grade II Registered Park and Garden. The park is Metropolitan Open Land and is designated OS4 (Alexandra Park and Palace) in the Development Management DPD.

2.7 Policy SP12 requires all development to protect the Strategic View from Alexandra Palace to St Paul's Cathedral (London View Management Framework, London Panorama 1). The DPD Schedule of Locally Significant Views also identifies local views from the palace (views 3, 11 and 14) and towards it (views 8, 9 and 15 to 23).

2.8 By bringing the south-west wing back into use and funding repair of the basement, the scheme supports Policy DM9(F), which seeks opportunities to secure the future of listed buildings on the Heritage at Risk Register.

Approach

2.9 This statement is structured around the energy hierarchy of London Plan Policy SI 2 (Be Lean, Be Clean, Be Green, Be Seen), followed by sustainable design standards, overheating, air quality, flood risk and drainage, carbon offsetting and wider sustainability measures. It should be read alongside the Design and Access Statement, and associated planning documents.

3.0 Policy Framework

3.1 The adopted development plan comprises the London Plan (2021), Haringey's Local Plan: Strategic Policies 2013–2026 (consolidated 2017) and the Development Management Policies DPD (2017). The principal policies relevant to this statement are as follows:

Policy	Requirement relevant to this scheme
London Plan SI 2	Energy hierarchy (Be Lean, Be Clean, Be Green, Be Seen). At least 35% on-site reduction beyond Part L 2021, with 15% from energy efficiency for non-residential uses. Shortfall to net zero offset.
London Plan SI 3 and SI 4	Heat networks; cooling hierarchy and overheating.
SP4(1)(b)	Non-residential development to achieve at least BREEAM "Very Good" and aim for "Excellent". Non-residential development to be zero carbon from 2019.
SP4(2)(a)–(c)	Assess and implement site-wide and area-wide decentralised energy; prioritise connection to existing or planned networks.
SP4(2)(d)	Where viable, a 20% reduction in predicted CO_2 emissions from on-site renewable energy generation (paragraph 4.1.27: unless shown not to be feasible).
SP4 paragraph 4.1.10	In historic settings, energy measures should minimise physical impacts on historic fabric and be reversible wherever practicable.
SP5	Water efficiency in construction and operation; sustainable drainage; reduce all forms of flood risk.
SP6	Site Waste Management Plans required for all major applications.
SP11	Sustainable design and construction; low embodied energy materials; flexible and adaptable buildings.
SP12	Conserve heritage assets and their settings; protect the Strategic View from Alexandra Palace to St Paul's and key local views.

Policy	Requirement relevant to this scheme
SP13	Protect Metropolitan Open Land and registered parks; protect and improve biodiversity.
DM9	Heritage significance statement required (B). Where sustainability measures conflict with significance, priority to the heritage asset (paragraph 2.62). Support for securing Heritage at Risk buildings (F).
DM19 and DM20	Nature conservation; open space, including ancillary event facilities in parks (DM20(E)).
DM21	Sustainable design, layout and construction: energy and cooling hierarchies, biodiversity, materials, local labour (A); carbon offset where on-site targets cannot be met (D).
DM22	Decentralised energy: majors within 500 m of a network or connection zone to connect or be designed to connect (E–G); feasibility assessment on submission (paragraph 4.46).
DM23	Air quality assessment for major development; air quality neutral; noise and light pollution.
DM24, DM25 and DM26	Flood risk; SuDS with greenfield run-off for majors; Critical Drainage Areas.
NPPF (August 2026), HE6	Harm to designated heritage assets weighed against public benefits.

3.2 Haringey applies a carbon offset price of £95/tCO_2 over 30 years (£2,850 per tonne), plus a 10% management fee, set out in the Carbon Offset Fund Allocation Strategy 2025–2029.

3.3 Some supporting text in the Strategic Policies and DPD refers to earlier London Plan policies and standards (for example Code for Sustainable Homes and gas-fired CHP). These have been superseded by the London Plan (2021), and this statement applies the current requirements.

3.4 Haringey's Regulation 18 Draft Local Plan (consulted on from October 2025) and the Draft London Plan 2026 carry limited weight at this stage.

4.0 Methodology

4.1 Emissions have been calculated with IES VE v7.0.31 (SBEM v6.1.e.2, BRUKL v6.1.e.1) against Approved Document L 2021 (England), using SAP 10.2 carbon factors and London weather data. Each stage of the hierarchy is modelled in turn and compared with the Part L 2021 notional building (TER).

4.2 The building has been modelled as General Assembly and Leisure, Night Clubs and Theatres (99%) and Restaurants and Cafes / Drinking Establishments (1%, cold stores), with a total floor area of 1,471.9 m² and an external envelope area of 4,488.9 m².

5.0 Energy Strategy (Policy SI 2; SP4; DM21; DM22)

Be Lean – Use Less Energy

5.1 The specification is close to the practical limit for a lightweight framed building and is considered to deliver the maximum practicable saving at this stage of the hierarchy, in line with Policy DM21(A)(a): −1.7% against the 15% target. The proposed specification is as follows:

Element	Proposed
External walls (composite panel)	U = 0.12 W/m²K
Pitched roof	U = 0.13 W/m²K
Floor over existing basement slab	U = 0.18 W/m²K
Glazing	U = 1.2 W/m²K, g = 0.40
Personnel doors	U = 1.6 W/m²K

Element	Proposed
Air permeability	3 m³/(h·m²) @ 50 Pa
Thermal bridging	Calculated psi-values (alpha 7.34%)
Ventilation	Central AHU SFP 1.0 W/(l/s), heat recovery 80%, CO_2 demand control; local MVHR to offices
Lighting	LED at 140 lm/W, constant illuminance, daylight dimming, occupancy sensing throughout
Monitoring	Sub-metering with out-of-range alarms

5.2 Low g-value glazing to the Stage and Conference Hall limit solar gain.

Be Lean Performance

5.2a The Be Lean model achieves a Building Emission Rate (BER) of 5.97 kgCO_2/m²/yr against a Target Emission Rate (TER) of 5.77 kgCO_2/m²/yr. In the GLA Carbon Emission Reporting Spreadsheet, which credits the Be Lean stage with the notional building's PV, regulated emissions are 8.64 tCO_2/yr against a baseline of 8.49 tCO_2/yr. This is a Be Lean result of −1.7% (0.15 tCO_2/yr above the baseline), below the 15% target. The reasons are set out below.

5.2b **Methodology:** in line with the GLA Energy Assessment Guidance, the heat pumps are modelled at the Be Lean stage with notional system efficiencies (heating 2.64, cooling 5.0, hot water 2.86). The specified efficiencies (SCOP 4.5, SEER 7.0, hot water 3.5) are credited only at Be Green, where they deliver a further 14.1% saving. The Part L 2021 notional building is itself heat pump-led, so the Be Lean stage measures the fabric, ventilation and lighting of the proposed building against an already efficient, all-electric baseline.

5.2c **Fabric and lighting:** the BRUKL output confirms that the fabric and lighting outperform the notional building:

+ area-weighted U-values of 0.12 W/m²K for the walls and 0.13 W/m²K for the pitched roof, against limiting values of 0.26 and 0.16 W/m²K
+ average conductance of 858.6 W/K, 4% lower than the notional building (894.5 W/K), with thermal bridging accounting for 7.3% of heat loss against 9.5% in the notional building
+ lighting energy of 8.54 kWh/m², 24% lower than the notional building (11.26 kWh/m²), and hot water energy 11% lower (2.46 against 2.76 kWh/m²)

5.2d **Where the shortfall arises:** the shortfall comes from cooling energy (6.23 kWh/m² against 4.43 kWh/m² in the notional building) and auxiliary fan and pump energy (16.30 kWh/m² against 14.51 kWh/m²). These are driven by the nature of the use and the constraints of the site, rather than by the fabric:

+ **Events use:** the space accommodates high and variable occupancy (up to 510 seated covers), with high internal gains that require comfort cooling, and a catering kitchen with a high extract rate (2,929 l/s)
+ **Fixed glazing position:** the glazing to the Stage and Conference Hall faces south behind the historic arched openings of the retained colonnade. Its position and orientation are fixed by the retained shell of the listed building, and external shading devices would not be appropriate on the listed façade
+ **Limited passive cooling:** natural ventilation and night cooling are not available, owing to the need for acoustic control of events and the enclosed position of the structure within the palace, so cooling and ventilation rely on mechanical systems
+ **Lightweight construction:** the composite panel and steel frame construction, suited to a demountable structure with a 10-year consent, provides very little thermal mass. Unlike a heavyweight permanent building, the structure cannot absorb and buffer peak heat gains from a full events space, which removes a step in the cooling hierarchy (managing heat through exposed thermal mass) and increases reliance on mechanical cooling. The insulation standard itself is not limited by the form of construction: the wall and roof U-values exceed the notional building

5.2e **Proportionality:** the Be Lean shortfall equates to 0.15 tCO_2/yr. The fabric already exceeds the limiting standards by a wide margin, so further fabric improvement would have little effect on the cooling and auxiliary energy that drive the result, and would be disproportionate for a semi-permanent structure with a 10-year consent. At the Be Green stage, the building complies with Part L 2021 (BER 5.06 against TER 5.77 $kgCO_2/m^2/yr$; BPER 54.94 against TPER 62.11 $kWhPE/m^2/yr$), and the approach to residual emissions is set out in Section 10. The proposal follows a conservation-led approach within the retained historic setting, which constrains opportunities to optimise orientation, glazing position, external shading and natural ventilation. These constraints should be considered alongside the proposed 10-year consent and the building's role as an interim replacement for an existing events facility. The final modelled specification meets the Part L emission and primary energy targets reported above.

Be Clean – Supply Energy Efficiently (Policy SP4(2); DM22)

5.3 Policy SP4(2) and Policy DM22(D) to (G) require developments to prioritise connection to existing or planned decentralised energy (DE) networks. Major developments within 500m of a planned future network, or of a DE connection zone, is expected to be designed for connection and, where the network is likely to be operational within three years, to secure connection subject to technical feasibility and financial viability.

5.4 The London Heat Map (Greater London Authority) shows a proposed district heat network route crossing Alexandra Park, within the Alexandra Palace grounds, and extending east towards Wood Green and Noel Park (Figure 5.1). The Panorama Room is therefore within 500 m of a planned future network, and Policy DM22(G) applies: the development should be designed for connection.

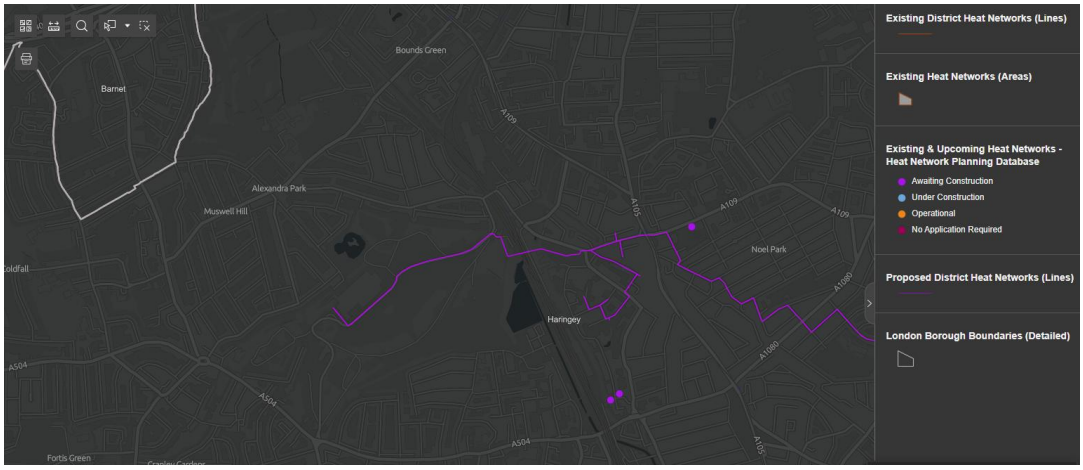

Figure 5.1: Extract from the London Heat Map showing the proposed district heat network route (purple) through Alexandra Park. Source: Greater London Authority, accessed October 2026.

5.5 The route is shown as a proposed network only. No operational network, energy centre or delivery programme has been identified, and the Heat Network Planning Database records no operational schemes near the site; the nearest entries are individual schemes awaiting construction around Wood Green and one under construction to the south-east, none of which is connected to the proposed route. The network is therefore not expected to be operational within three years, so the connection requirement of Policy DM22(F) is not triggered at this stage, and no Be Clean saving is claimed.

5.6 The building services have been future-proofed so that the Panorama Room can connect to the proposed network when it becomes available, without major alteration to the building or its systems. The following provisions are made:

+ **Plant space:** space safeguarded within the plant room for a heat interface unit or plate heat exchanger, with metering

+ **Connection route:** a safeguarded pipe route from the plant room to the building boundary, with capped connection points, coordinated with the heritage and basement works

+ **Secondary systems:** the hot water system is designed to operate at temperatures compatible with a low-temperature heat network supply, so that network heat can replace or supplement the heat pumps

+ **Controls and metering:** the building management system and sub-metering arranged to accommodate a network supply

5.7 The applicant will commit to connect, by planning condition or legal agreement, should connection prove feasible and viable within the consent period (paragraph 4.48).

5.8 The all-electric heat pump system provides low carbon heat in the interim and is compatible with a future network connection. Gas-fired CHP would conflict with the zero-carbon objective and is not proposed.

Be Green – Use Renewable Energy (Policy SP4(2)(d))

5.9 Policy SP4(2)(d) seeks, where viable, a 20% reduction in predicted CO_2 emissions from on-site renewable energy generation. ASHPs deliver a 14.1% saving. The low and zero carbon technologies considered are summarised below:

Technology	Outcome
Air source heat pumps (VRF, FCUs, cassettes and DHW)	Proposed. SCOP 4.5, SEER 7.0, DHW efficiency 3.5.
Solar PV	Not included in the current proposal due to identified heritage and roof-interface concerns. Structural capacity, fixing requirements and the suitability of an installation also raise concerns given the semi-permanent nature of the structure.
Ground source heat pumps	Discounted. Boreholes would disturb the historic basement now being stabilised.
Solar thermal	Discounted. Same roof constraints as PV, and DHW demand is already met by heat pump.
Wind	Discounted. Not suited to a listed building in a conservation area and registered park.
Biomass	Discounted. Air quality (whole borough is an AQMA), fuel delivery and storage constraints.

Heritage Assessment of PV

5.10 Policy DM9 (paragraph 2.62) recognises that heritage assets may need change to deliver energy efficiency, but states that where there is a conflict between delivering sustainability measures and the potential to cause damage to the significance of the heritage asset, priority will be afforded to the preservation of the heritage asset. SP4 paragraph 4.1.10 adds that well-designed measures, sensitive to the historic context, can contribute to carbon targets, and that impacts on historic fabric should be minimised and reversible.

5.11 PV is not proposed for the following reasons:

+ **Sensitivity of the asset and its setting:** the palace is Grade II listed, on the Heritage at Risk Register, within a conservation area and partly within a Grade II Registered Park and Garden. The new roof sits within the shell of the south-west wing and forms part of the palace's roofscape

+ **Views from the palace:** the roof is likely to be overlooked from the upper levels of the retained south range and the Southwest Tower, where an array would introduce a reflective, mechanical surface

+ **Design intent:** the roof form was tested across three options and chosen to be recessive, with a matt anthracite finish that sits quietly behind the historic colonnade. An array would undermine that intent

+ **Structural and weathering interface:** the roof is a lightweight faceted structure joined to the historic fabric by a valley gutter. Added load, fixings and cabling would add risk at that interface

+ **Interim nature of the structure:** the Panorama Room is a semi-permanent structure with a 10-year consent, pending a heritage-led rebuild of the Southwest wing. The approach to roof-level renewables is

better resolved as part of that permanent scheme, in which the design of the roofscape and its relationship to the historic palace will be determined comprehensively

5.12 On this basis, the provision of PV is not considered appropriate in this location, and the residual shortfall against SP4(2)(d) is addressed in Section 10.

Carbon Savings

5.13 The regulated carbon savings at each stage of the hierarchy, against the Part L 2021 baseline, are as follows:

	Regulated CO_2 savings (tonnes per annum)	**%**	**Target**
Be Lean	−0.15	−1.7	15%
Be Clean	0.0	0.0	–
Be Green	1.19	14.1	20% where viable (SP4)
Total cumulative savings	**1.05**	**12.3**	**35% minimum**
Residual emissions to offset	**7.45**	**–**	**Zero carbon (SP4)**

Be Seen

5.14 The applicant commits to monitoring and reporting operational energy performance through the GLA Be Seen platform. Sub-metering will be provided for heating, cooling, hot water, lighting, small power and the kitchen.

6.0 Sustainable Design Standards – Policy SP4(1)(b)

6.1 Policy SP4(1)(b) states that new non-residential development should be built to at least BREEAM "Very Good" and should aim to achieve BREEAM "Excellent".

6.2 The proposal replaces the existing Panorama Room, a marquee structure in events use since 2000, with a new enclosure of the same use within the footprint of the former south-west wing. It does not introduce a new use, floorspace in a new location or new occupiers to the site. Its role is to provide a weathertight, energy-efficient replacement for an existing events space within the listed palace.

6.3 The proposals have been the subject of three pre-application meetings with LBH. Formal BREEAM certification has not been raised as a requirement.

6.4 Formal BREEAM New Construction certification is not proposed, for the following reasons:

+ **Nature of the works:** the scheme replaces an existing structure within the retained shell of a Grade II listed building. Many BREEAM credits relate to site selection, land use, ecology, transport and external works, which are fixed by the existing palace and park and cannot be influenced by the scheme

+ **Heritage constraints:** credits for on-site renewables, external lighting, landscaping, surface water run-off and daylighting are limited by the need to protect the significance of the listed palace, its setting and the Strategic View to St Paul's (Policies SP12 and DM9). A certified rating would reflect the constraints of the historic site rather than the environmental performance of the new structure

+ **Proportionality:** the structure is a lightweight, semi-permanent building with a 10-year consent, pending a future heritage-led rebuild of the south-west wing. The cost and process of formal registration and certification are disproportionate to an interim structure of this lifespan, and the long-term sustainability standard of the wing is more appropriately set by the permanent scheme

6.5 The scheme nonetheless follows the intent of Policy SP4(1)(b) and Policy DM21 by incorporating measures consistent with BREEAM good practice:

+ **Energy:** a fabric and services specification delivering an all-electric heat pump system, sub-metering and Be Seen monitoring (Section 5)
+ **Health and wellbeing:** heat recovery ventilation with CO_2 demand control, comfort cooling, and high-efficacy, controllable lighting (Section 7)
+ **Water:** low flow sanitaryware and fittings consistent with the BREEAM Wat 01 credits (Section 9)
+ **Materials and waste:** a prefabricated, demountable frame, materials with high environmental performance ratings, and a Site Waste Management Plan (Section 11)
+ **Pollution:** no on-site combustion, low-GWP refrigerants with leak detection, and controlled external lighting (Sections 8 and 11)

6.6 On this basis, the proposal is considered to meet the objectives of Policy SP4(1)(b) in a manner proportionate to the nature of the works and the constraints of the historic site.

7.0 Overheating – Policy SI 4; DM21(A)(b)

7.1 Policy DM21(A)(b) and London Plan Policy SI 4 require the cooling hierarchy to be applied, to reduce the potential for overheating and reliance on air conditioning. Compliance with the cooling hierarchy is demonstrated as follows:

+ Minimising internal heat generation: high-efficacy LED lighting (140 lm/W) with daylight and occupancy controls
+ Reducing heat entering the building: the structure sits within the retained shell of the palace, behind the south colonnade, which shades the south elevation. Low g-value glazing (g = 0.40), a highly insulated envelope (roof U = 0.13 W/m²K) to limit solar gain
+ Passive ventilation: limited by the need for acoustic control of events and by the enclosed position of the structure within the palace
+ Mechanical ventilation: heat recovery ventilation with CO_2 demand control, sized to occupancy
+ Active cooling: provided by the ASHP system at SEER 7.0, as a supplementary measure proportionate to the high and variable occupancy of the events space

7.2 The Part L 2021 (BRUKL) assessment shows that the solar gain limit is met in the Entrance Lobby (−68.1%) but exceeded in the Stage (+135.7%) and Conference Hall (+79.3%), which have been modelled without internal blinds. These spaces are mechanically ventilated and comfort cooled, so solar gain is managed by the cooling system, as reflected in the Be Lean cooling energy (paragraph 5.2d).

7.3 Paragraph 4.33 of the DPD expects dynamic thermal modelling, particularly for dwellings and uses whose occupants are more vulnerable to overheating. The Panorama Room is a mechanically ventilated and comfort-cooled events space, occupied intermittently by visitors rather than residents. Its internal conditions are controlled by the cooling system rather than by free-running performance, which is what a CIBSE TM52 assessment tests. A separate overheating assessment has therefore not been undertaken.

7.4 The cooling plant has been sized by the building services engineer to maintain internal design conditions at peak occupancy. Should LBH require further evidence, a dynamic thermal assessment can be secured by planning condition.

8.0 Air Quality – Policy DM23

8.1 The whole of Haringey is an Air Quality Management Area. Policy DM23(B) requires an air quality assessment for all major developments, and the Council expects development to be at least air quality neutral.

8.2 The development has no on-site combustion plant. Heating, cooling and hot water are provided by ASHPs, so there are no building-related NOx or particulate emissions.

8.3 Transport emissions relate to the events use of the Panorama Room, which replaces an existing events space of similar function.

8.4 Construction dust will be controlled through the Construction Environmental Management Plan.

8.5 External lighting will be designed to be appropriate to its setting, to minimise glare and light spill to the park and to bat habitat, and to be energy efficient, in line with Policy DM23(F).

9.0 Flood Risk and Drainage – Policies SP5; DM24; DM25; DM26

9.1 The site lies in Flood Zone 1. Figure 4.5 of the DPD indicates that Alexandra Park falls within a Critical Drainage Area.

9.2 Policy DM25(B)(a) requires major developments to reduce surface water flows to a greenfield run-off rate for the 1 in 100-year critical storm event. Where this cannot be achieved, run-off should be reduced as far as possible, with justification. Policy DM26 requires development within a CDA to reduce overall flood risk.

9.3 The new roof drains to the valley gutter and new surface water drainage installed as part of the basement works. Attenuation and SuDS measures will be incorporated into the development.

9.4 Water efficiency will be addressed through low flow sanitaryware and fittings in line with Policy SP5.

10.0 Carbon Offset – Policy SI 2; DM21(D)

10.1 Policy DM21(D) allows carbon offset payments, secured by planning obligation, where proposals are unable to meet carbon reduction targets on site. The applicant recognises this policy. In light of the 10-year temporary consent and the interim nature of the structure, the applicant would discuss with LBH the need for, and basis of, any contribution, subject to the Trust's agreement.

11.0 Wider Sustainability – Policies SP6; SP11; SP13; DM19; DM21

Waste and Construction

11.1 A Site Waste Management Plan will be prepared, as required by Policy SP6 for all major applications, identifying the volume and types of construction waste and how it will be minimised and managed.

11.2 The prefabricated steel frame and composite panels reduce site waste and programme. The frame is demountable, supporting future reuse in line with the flexibility and adaptability objectives of Policy SP11.

Materials and Local Labour

11.3 Materials with high environmental performance ratings will be specified wherever possible, in line with Policy DM21(A)(d) and SP11. Opportunities for locally sourced labour will be sought, in line with DM21(A)(e).

Biodiversity and Open Space

11.4 The structure sits within the footprint of the former south-west wing and the existing Panorama Room, so there is no loss of open space or habitat in the park, consistent with Policies SP13 and DM20.

11.5 A living roof has not been proposed. Paragraph 4.37 of the DPD recognises that living roofs may not be appropriate in conservation areas, and the roof is designed to be recessive in the setting of the palace.

Refrigerants

11.6 The VRF systems will use low-GWP refrigerant where available.

12.0 Summary of Compliance

12.1 The table below summarises the proposed development's position against the policy requirements addressed in this statement.

Policy	Requirement	Compliance
SI 2 / DM21 (Be Lean)	15% reduction through energy efficiency	−1.7% achieved. Section 5.
SP4(2) / DM22 (Be Clean)	Connect to or design for DE networks within 500 m	Proposed network within Alexandra Palace grounds; building future-proofed for connection. Section 5.
SP4(2)(d) (Be Green)	20% from on-site renewables, where viable	14.1% through ASHPs. PV not proposed on heritage grounds (DM9 paragraph 2.62). Section 5.
SI 2 (on-site)	35% minimum on-site reduction	12.3% achieved. Section 5.
SI 2 / SP4 / DM21(D)	Zero carbon; residual emissions offset	Policy recognised; the need for any contribution to be discussed with LBH in light of the 10-year consent. Section 10.
SI 2 (Be Seen)	Monitor and report energy performance	Committed. Section 5.
SP4(1)(b)	BREEAM "Very Good", aim "Excellent"	BREEAM-aligned approach; certification not proportionate to replacement of an existing structure in a listed building. Section 6.
SI 4 / DM21(A)(b)	Cooling hierarchy	Demonstrated; space is mechanically ventilated and comfort cooled. Section 7.
DM23	Air quality assessment; air quality neutral	No combustion plant. Section 8.
SP5 / DM24–DM26	Flood risk, SuDS, greenfield run-off, CDA	Flood risk minimised. Section 9.
SP6	Site Waste Management Plan	Committed. Section 11.
SP11 / SP13 / DM19 / DM21	Materials, biodiversity, open space	Addressed. Section 11.
SP12 / DM9	Conserve heritage assets, setting and views	Summarised in Sections 2 and 5.

13.0 Conclusion

13.1 The Panorama Room achieves the maximum practicable Be Lean saving and an all-electric, heat pump Be Green strategy delivering a 14.1% saving.

13.2 PV is not proposed, because of its potential impact on the significance and setting of the listed palace, to which Policy DM9 gives priority. The 5.9-point shortfall against SP4(2)(d), and the residual emissions are acknowledged; the approach to any carbon offset contribution is set out in Section 10.

13.3 As a lightweight, semi-permanent structure with a 10-year consent, the scheme provides an interim, energy-efficient use of the Southwest wing without precluding a future heritage-led rebuild.

13.4 Subject to the shortfalls against London Plan Policy SI 2 and Haringey Policy SP4(2)(d) identified in this statement, the proposal is considered to accord with Haringey Policies SP4 to SP6, SP11 to SP13, DM9 and DM19 to DM26.

13.5 The proposal incorporates an insulated envelope, efficient lighting, heat recovery ventilation and an all-electric heat pump strategy. It replaces an existing marquee with documented heating and comfort shortcomings, within a sensitive historic setting.

13.6 The conservation-led design and proposed 10-year consent provide relevant context for assessing the proportionality of further measures. Opportunities for improvement will continue to be reviewed as the design develops, with technical constraints substantiated by the relevant designers.

13.7 The identified policy shortfalls are acknowledged. The applicant seeks LBH's consideration of the proposed approach in light of the heritage constraints, interim nature of the development and benefits of replacing the existing facility. Any carbon offset contribution would be discussed separately, subject to the Trust's agreement and the applicable planning requirements.