

Dear Valerie Okeiyi

Re: HGY/2024/2584 13 Bedford Road London N22 7AU

Please accept this letter as my objection to the above proposal for planning permission for the *“Demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use Class E) at ground level, 12no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun, plant enclosure and pv panels at roof level”*.

I live at Flat 4, 357 Alexandra Park Road, a semi-detached 2-storey building containing four flats, less than 10m from the application site. The proposals are not sufficiently considered, will have a negative impact on the local area and are not in accordance with national, London and Haringey policy.

My specific objections are as follows:

1. Too tall

Haringey DPD Policy DM1 Design Standards, Character of development: *“(B) Development proposals should relate positively to their locality, having regard to: (a) Building heights; (b) Form, scale & massing prevailing around the site.”*

DPD Policy DM6: Building Heights *“(A) For all development proposals, the Council expects building heights to be of an appropriate scale which respond positively to the site’s surroundings, the local context, and the need to achieve a high standard of design in accordance with Policy DM1.”*

The proposals are a storey higher than the ridge of the neighbouring 10 Bedford Road (proposals 2.9m higher) and flat roof of 357 Alexandra Park Road (proposals 3.8m higher). The proposed massing does not respect the pitched roof of 10 Bedford Road. (drawing 1544/07, east elevation). The proposals will be visible from Avenue Gardens, The Starting Gate Pub and on the approach over the station footbridge that many visitors take on the route up to Alexandra Palace. The rear elevation, roof plant enclosure and lift over-run will be visible along the east end of Alexandra Park Road most of the way to the junction with Palace Gates Road, particularly in winter when tree foliage is reduced.

DPD Policy DM6: Building Heights *“(B) Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in urban design terms and should conform to the following general design requirements: (a) Be of a high standard of architectural quality and design, including a high quality urban realm; (c) Conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that would be sensitive to taller buildings (see Policy DM9).”*

The proposals are taller than its neighbours but the design

- is not of a high standard of architectural quality and design (see comments on elevations below),
- does not include a high quality urban realm, and
- does not improve the nearby Wood Green Common Conservation Area or the approach to the listed Alexandra Palace. The site is visible from both locations contrary to the Heritage Assessment item 31.

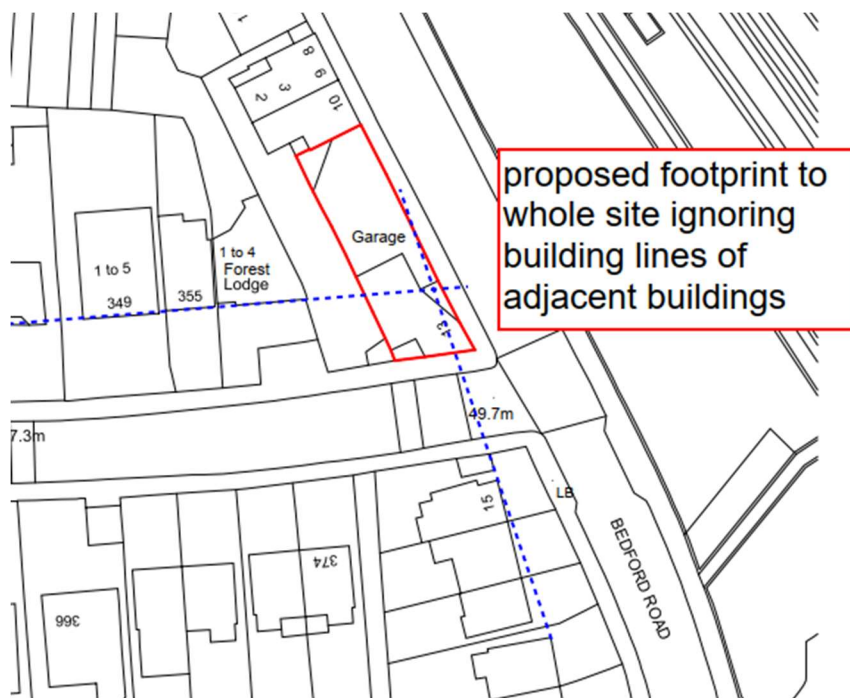
DPD Policy DM6: Building Heights “(E) All proposals for taller or tall buildings must be accompanied by an urban design analysis which assesses the proposal in relation to the surrounding context. This should include the submission of a digital 3D model to assist in the understanding of the design concept and impacts of the development.”

The proposals are taller than its neighbours but the application does not include an urban design analysis or 3D model.

2. Projects beyond existing building lines

Haringey DPD Policy DM1 Design Standards, Character of development: “(B) Development proposals should relate positively to their locality, having regard to: ... (d) Maintaining a sense of enclosure and, where appropriate, following existing building lines.”

The proposals project 10m beyond the front of buildings along the north side of Alexandra Park Road and 3m beyond the pattern of stepping back of 15-19 and 21-23 Bedford Road (drawing 1544/01).



3. Character context:

Haringey DPD Policy DM1 Haringey Development Charter: “(A) All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria: (a) Relate positively to neighbouring structures, new or old, to create a harmonious whole;”

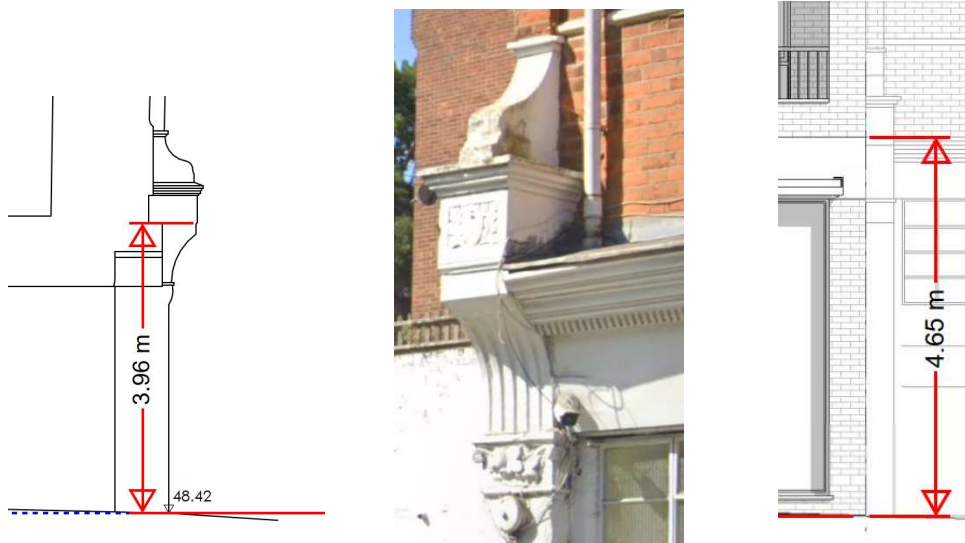
The proposed storey heights for the first floor and above, the parapet line, main roof line and north flank wall do not relate to the neighbouring 10 Bedford Road / Palace Mansions.

The window and balcony treatment of the proposals are unresponsive to the variations in the Bedford Road elevation of 10 Bedford Road which has a clear hierarchy of window forms and reducing storey heights.

The plans do not show a survey of the west or east elevations of 10 Bedford Road / Palace Mansions making it hard to assess alignment heights of elevations. From the surveyed south elevation of 10 Bedford Road the top of the cornice to the shop front is 3.96m above ground but the proposed east

elevation shows it at 4.66m, so the proposed shop front may not align with 10 Bedford Road shop front.

Left: Existing south elevation of 10 Bedford Road 1544/04; **Middle:** Google Maps street view - notice alignment of top of shop front corbel to small overhang in end elevation. Together with the existing south elevation above this shows the neighbouring shop front is 3.96m high. **Right:** Proposed elevation 1544/07 shows neighbouring shop front 4.65m high.



Haringey Local Plan SP1: Managing Growth “*The Council will focus Haringey’s growth in the most suitable locations... Parts of the Borough outside of the Growth Areas and Areas of Change will experience some development and change in contributing towards meeting local development needs. The Council will ensure that development in these Areas of Limited Change will respect the character of its surroundings and provide environmental improvements and services.*”

The site is not within one of Haringey's Growth Areas or Areas of Change ref Haringey's Local Plan Policy SP1 Managing Growth Fig 3.1 but the proposals do not respect the local character.

4. Elevations:

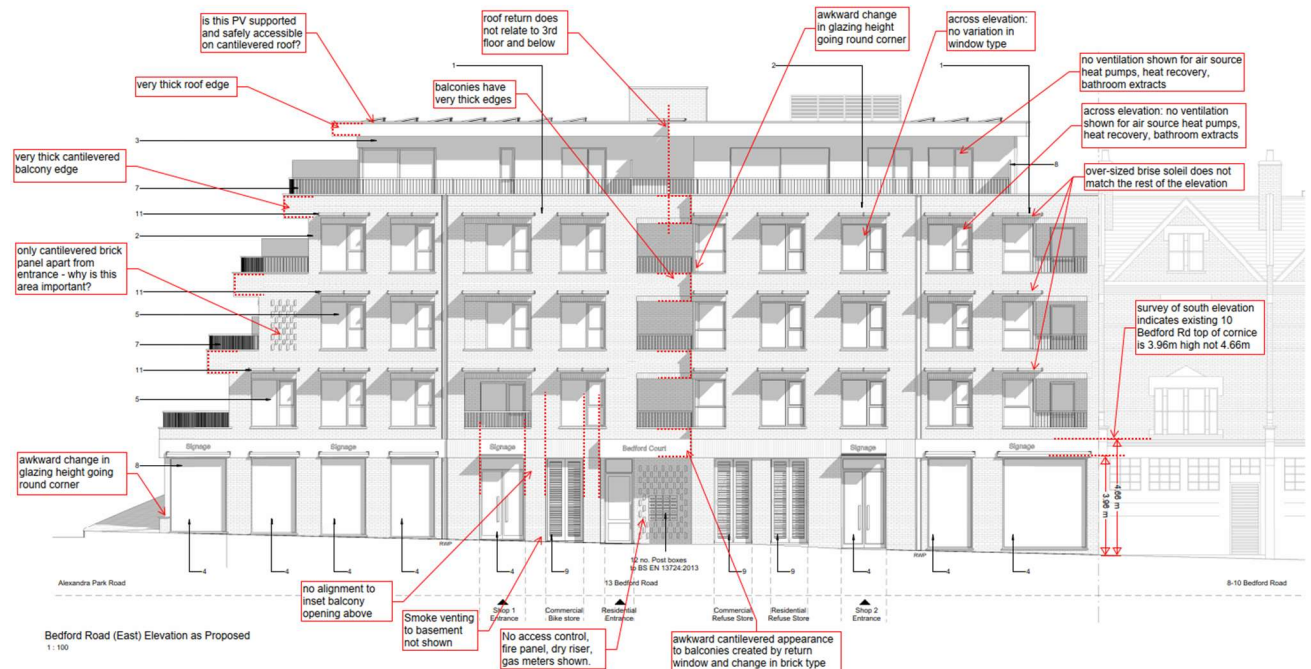
Haringey DPD Policy DM1 Haringey Development Charter “(A) *All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area.*”

Ref to attached mark-up of drawing 1544-07 Elevations as Proposed.

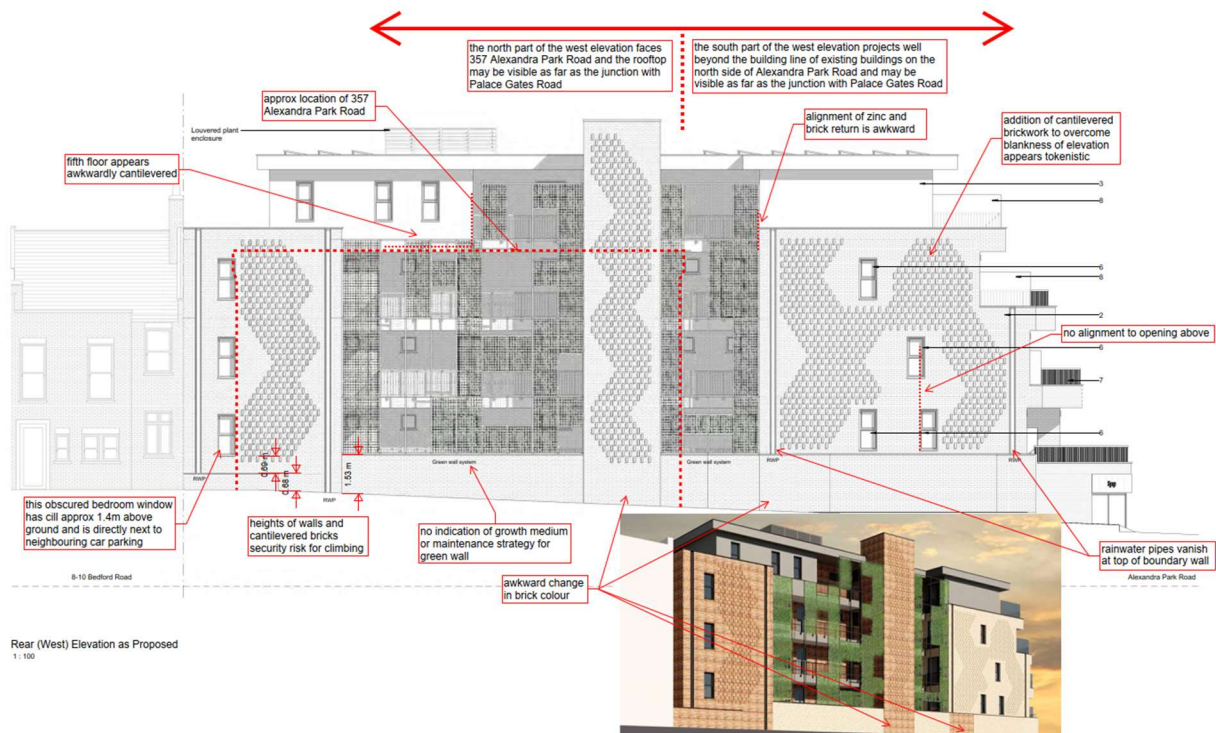
The elevation treatment is not sufficiently considered:

- Window and balcony treatment is undifferentiated, using the same window type and balcony detailing across the east elevation.
- Insufficient definition between yellow & red brick bays e.g. awkward balcony treatment above residential entrance so it looks like southern red brick balconies cantilever towards the yellow brick.
- Lack of hierarchy in façade: steps in plan do not prioritise important elements like entrances to shops to help make a readable façade.
- Inelegant, chunky roof & balcony edges.
- Awkward window returns with differing ground / sill levels e.g. shop front south-east corner and balconies above residential entrance. Awkwardly co-aligned brick and zinc to fifth floor west elevation.

- Multiple vertical misalignments between windows & openings e.g. south shop entrance and windows above.
- Arbitrary inclusion of hit & miss brick cantilever panel at 2nd floor but nowhere else on this elevation main elevation except at the entrance.
- Services not shown adjacent to entrance e.g. access panel, dry riser, gas meters, fire panel.
- Ventilation not shown for heat recovery / air source heat pumps and bathroom / kitchen extracts.
- Not clear how windows will be cleaned with brise soleil in the way.



- Awkward cantilevered appearance to fifth floor north-west corner.
- Addition of cantilevered brickwork to west elevation to mitigate its blank nature appears token and insufficient.



5. Roofscape & green wall:

The London Plan 2021 Policy D6 Housing quality and standards Table 3.2 “Usability and ongoing maintenance (vi) The development should ensure that: ... features are designed to allow maintenance activities such as window cleaning, to be undertaken with ease...”

No maintenance access is shown to green roofs; photovoltaic panels do not have access space between them and are shown on cantilevered portion of roof where it is not clear that roof structure will supporting the panels and maintenance workers (drawing 1544/06). The example reference for the green wall is a CGI (drawing 1544/12) and does not show the growth medium, irrigation or maintenance access.

6. Security and Secured by Design:

Haringey DPD Policy DM2 Accessible and Safe Environments “(A) Proposals should ensure that new developments: (d) Have regard to the principles set out in ‘Secured by Design’.”

The west elevation has low walls, ledges and cantilevered brickwork within 2.1m of the ground presenting a climbable surface and hence a security risk

7. Fire safety:

The London Plan 2021 Policy D12 Fire safety “(A) In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they... (2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures constructed in an appropriate way to minimise the risk of fire spread... (6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.”

Ref Planning Fire Statement in Line with London D12A and drawing 1544/09 Fire Strategy.

Various fundamental issues from the Fire Statement do not appear to have been addressed and may require significant changes to design which, in turn, may change viability and external appearance. E.g.

- Ancillary bike and bin stores and basement stair should not connect to the staircase (Fire Statement p.11 & 12) but drawings show internal doors.
- Basement smoke vents not indicated on drawings (Fire Statement p.13).
- Sprinklers indicated but location of sprinkler tank & risers not shown (drawing 1544/09).
- Dry riser not shown (Fire Statement p.8).

The London Plan 2021 Policy D12 Fire safety “(A) In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they... (3) are constructed in an appropriate way to minimise the risk of fire spread”

Ref Planning Fire Statement in Line with London D12A and drawing 1544/09 Fire Strategy.

Impact of green wall on west site boundary not referenced as a potential fire risk. Walls and windows within 1m of site boundary (Fire Statement p.9 & 11) not indicated on drawing. Walls and windows within 1.1m of deck access not indicated on drawing (Fire Statement p.12).

It is not clear how balconies adjacent to external escape decks & cladding & glazing adjacent to external escape decks will be fire rated to prevent fire risk to escape route.

8. Daylight / sunlight:

Haringey DPD Policy DM1 Design Standards, Privacy and amenity “(D) Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The Council will support proposals that: (a) Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land”

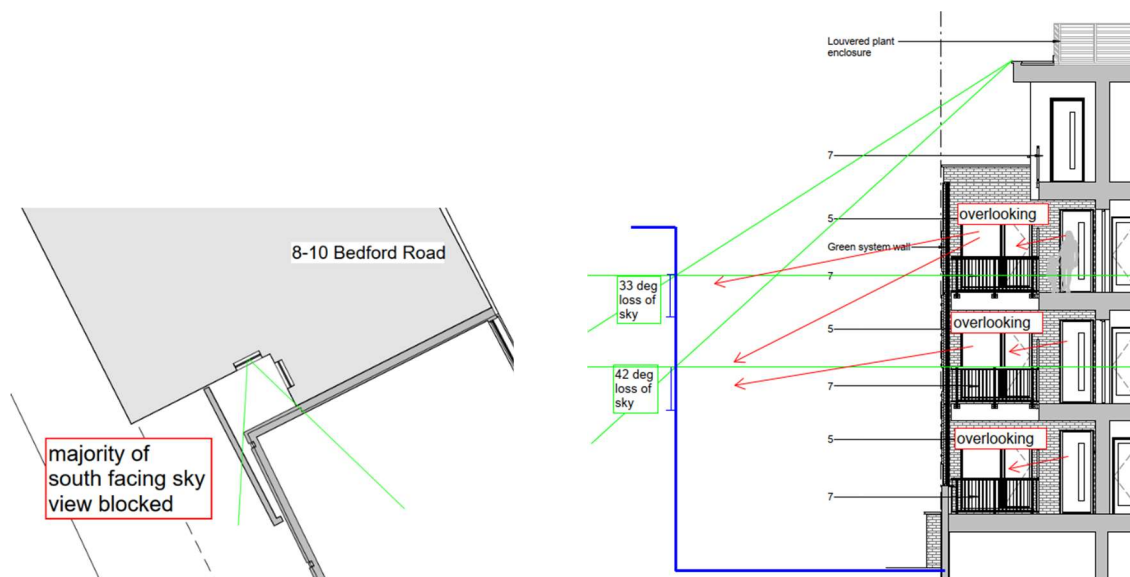
Ref: Daylight, Sunlight & Overshadowing Assessment.

The assessment appears not to have assessed multiple locations on neighbouring properties:

- Vertical Sky Component Daylight Pre development for Win04 & Win09 to 357 Alexandra Park Road missing (p.9, Table 2).
- Report states 10 Bedford Road, Win01 and Win03 meet BRE sunlight guidance but these windows are almost entirely blocked by the proposals (p.11, Table 5).
- Whilst BRE guidance recommends assessment of windows within 90 deg of south (p.10), in this case Win04 & Win09 to east elevation of 357 currently get hours of sunlight in the morning and will be strongly impacted by the proposed development and will certainly not receive >371.5 hrs sunlight post-development (p.12, Table 6).
- Over-shadowing to front garden of 357 Alexandra Park Road not assessed (p.14 Figure 2).

Left: Loss of daylight and sunlight to Win01 & Win03 at 10 Bedford Road / Palace Mansions

Right: Loss of daylight and sunlight to Win04 & Win09 in 357 Alexandra Park Road:



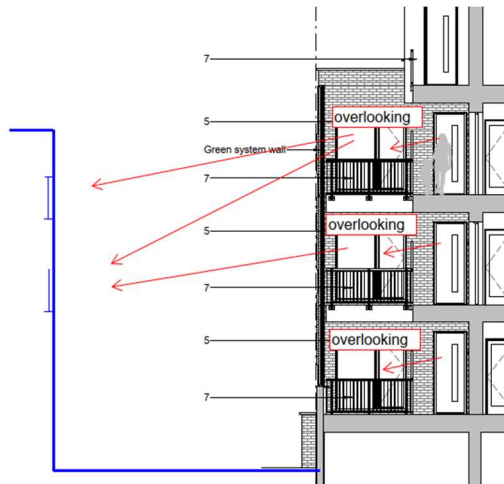
There are several rooms within the proposals that appear to have poor daylight, e.g. Bedroom 2 in Flats 1, 5 & 8 where daylight is only from an east-facing window in a 1.5m deep inset balcony. The Daylight, Sunlight & Overshadowing Assessment does not reference rooms within the development and the Energy & Sustainability Assessment makes subjective reference to daylight / sunlight so it does not appear that a modelled assessment has been made for rooms within the development.

9. Privacy:

Haringey DPD Policy DM1 Design Standards, Privacy and amenity “(D) Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The Council will support proposals that: ... (b) Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development;”

The Community Engagement Report states overlooking has been addressed (p.18) but windows in the proposals (flats 1, 4, 5, 7, 8, 10, 12) and balconies (flats 1, 5, 8) perpendicular to the west site boundary are not obscured leaving views towards bedroom windows in east elevation of 357 Alexandra Park Road (drawings 1544/05, 06). The Planning Statement states that angled views could be controlled by privacy screens (p.14 item 5.25) but this would provide habitable rooms with no view and would have to entirely enclose these balconies. These same balconies are also directly adjacent to deck access making them overlooked within the scheme. The deck access on the west elevation of the proposals also has views towards the same windows in east elevation of 357 Alexandra Park Road.

Below: Overlooking from deck access to balconies to Flats 1, 5, 8 and from balconies and deck access to windows on east elevation of 357 Alexandra Park Road



10. Dwelling design

The London Plan 2021 Policy D6 Housing quality and standards “(A) Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.”

Ref Nationally Described Space Standards (NDSS) and London Plan Policy D6 & Table 3.1

The table on drawing 1544/05 shows Flat 7 is 3b5p, 81sqm. The Planning Statement (p.15 item 5.29) states Flat 7 is 86sqm. The London and NDSS requirement is 86sqm for 3b5p so this flat is under-sized.

In general, where flats are larger than NDSS, the space is provided to the larger flats so 1b2p and 2b3p flats are at or close to the minimum allowable size.

The design of dwellings does not appear to be sufficiently considered:

- Drainage does not appear to stack vertically (e.g. Flat 13 WC position does not relate to flats below especially living room Flat 3) which will affect design and space standards of dwellings
- No built-in storage space shown e.g. flats 3, 5, 7 (ref The London Plan 2021 Table 3.1).
- No location for internal air source heat-pump or water cylinder (ref Energy & Sustainability Assessment p.11).

London Plan Guidance, Housing Design Standards “(C2.12) Fully furnished internal floorplans should be submitted for every dwelling type proposed, at a scale of at least 1:100 to enable assessment of the layout and ensure it is functional and fit for purpose... Note 1: ... Layouts that

cannot comfortably accommodate all of the prescribed furniture for the dwelling type in question (including kitchen units and appliances) will not be considered acceptable."

Kitchens for some units appear undersized risking impact on windows & external appearance e.g. flat 10 (3b6p) 4.3m worktop shown vs 6.73m requirement. Kitchen across window flat 7 will affect external appearance.

11. Internal design:

Internal design does not appear to be sufficiently considered, which may require significant changes to design which, in turn, may change viability, external appearance and conformance with internal space standards e.g.

- No service risers shown for services such as water, gas, heat recovery, ventilation, waste water, rainwater from top roof, sprinklers, dry riser.
- Clashes between doors, stair landing, wheelchair zones and roof access to lift lobbies and stair landings 1st-4th floor.

12. Accessibility:

London Plan Guidance, Housing Design Standards "(A5.2) At least 10 per cent of new dwellings should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' in Approved Document M, Volume 1 (ADM); the remainder should be 'accessible and adaptable dwellings' (referred to as M4(2) or Category 2 in ADM)."

Design & Access Statement states flat 2 is M4(3) and all other flats are M4(2).

Ref Approved Document M Volume 1, 2015 edition incorporating 2016 amendments (BRADM), Diagram 2.3:

M4(2): Most communal doors and some front doors to flats do not appear to have 300mm to leading edge required for M4(2) accessible flats.

M4(3), flat 2 misses some requirements e.g.

- Ref BRADM Figure 3.5C: hall does not provide 1.5m circle from entrance door leaf.
- Ref BRADM Item 3.26: No built-in storage shown.

13. Outdoor Amenity Space:

London Plan Guidance, Housing Design Standards "(C10) Private outside space (C10.1) Provide a minimum of one 5m² of step-free private outside space for homes with one or two bedspaces, with a minimum depth and width of 1.5m. An extra 1m² should be provided for every additional bedspace. ... Note 2: Where inset balconies are provided, the depth should be less than the external facing side to ensure the space is experienced as outside space and that adequate daylight and sunlight can reach the room behind."

The majority of balconies to 1 and 2 bed flats are less than 5sqm and less than 1.5m deep e.g. Flat 1 balcony to living room is 1.2 x 2m = 2.4sqm. Some inset balconies are deeper than they are wide e.g. Flat 2 balcony is 2.3m deep x 2.2m wide.

London Plan Guidance, Housing Design Standards "(C10) Private outside space (C10.3) Balconies should be accessed via the main sitting area or kitchen/dining room unless the specific circumstances make this impractical. Consider the need for privacy and/or shade on balconies (ideally adjustable sliding screens or retractable awnings)."

Haringey DPD Policy DM12: Housing Design and Quality “(B) ... family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity, privacy and design considerations...”

Balconies to west elevation are overlooked by the deck access e.g. Flats 1, 5, 8 balcony off bedroom 1.

Haringey Local Plan Policy SP13: Open space and biodiversity “New development shall provide opportunities for Children’s Play Space by:...▪ Making provision for children’s informal or formal play space in addition to amenity space provision as set out above;”

No separate children's play space is indicated.

14. Housing mix

London Plan Policy H10 Housing size mix “(A) Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to: (1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment... (6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity... (9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.”

Ref 2017 London Strategic Housing Market Assessment (LSHMA) Table 1 and Haringey Strategic Housing Market Assessment June 2021 (HSHMA) Figure 49 showing mix requirements for market sale homes

Source	1 bed	2 bed	3 bed	4+ bed
LSHMA	46%	9%	18%	27%
HSHMA	14%	26%	69%	-9%
Proposals	25%	50%	25%	0%

The proposals do not align with either LSHMA or HSMA and appear to over-provide 2 bed flats.

15. Noise and smell:

London Plan Policy D13 Agent of Change “(A) The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby... (C) New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. (D) Development proposals should manage noise and other potential nuisances by: (1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area (2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning

obligations (3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures. (E) Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed."

Noise

Ref Planning Noise Report

There does not appear to be any assessment of noise from:

- Roof plant where louvred enclosure is shown to be just 1m high.
- Users of deck access adjacent to bedroom windows in 357 Alexandr Park Road where use could be any time of day.

Smell

Ref Air Quality Assessment

There does not appear to be any assessment of possible odours from commercial use such as potential cooking extraction.

16. Transport:

Haringey DPD Policy DM32 para 5.8 "Appropriately located on-site disabled parking will be required with at least one on or off-site disabled parking space for each car-free development. Disabled parking spaces should be provided for all wheelchair accessible housing in car-free developments. The Council will not issue residents on-street parking permits for car free or car capped developments, which have a limited number of on-site parking spaces. However, occupiers of defined car free or car capped developments would be eligible for visitor's permits. The Council will use legal agreements to require landowners to advise occupiers of the car free or car capped status of a development. For family sized dwellings (3 or more bedrooms) the Council would expect car parking provision in line with its car parking standards."

Parking:

No parking has been indicated for M4(3) wheelchair adaptable Flat 2, wheelchair using visitors or for 3-bedroom flats.

The London Plan Policy T6.1 Table 10.3 for Outer London PTAL 2-3, 1 or 2 beds indicates up to 0.75 spaces per Dwelling and for 3+ beds indicates up to 1 space per dwelling.

London Plan Policy T5 Cycling "(B) Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people."

Bicycle storage:

Ref London Cycling Standards (LCS)

The bicycle stores do not include space for all types of cycles such as "handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles" (LCS p.4 item 8.2.1) or 1.2m wide access doors (LCS p.20 item 8.5.3) and the arrangement of the bike racks makes clashes with walls, doors, bikes and other users likely. It is not clear whether customers of the shops will be able to use the commercial cycle spaces.

17. Viability Assessment Report Addendum 2024

Haringey Local Plan policy SP2 “Affordable housing shall be achieved by: (5) Subject to viability, sites capable of delivering 10 units of more will be required to meet a Borough wide affordable housing target of 40%, based on habitable rooms;”

Haringey DPD Policy DM13 Affordable Housing “(A) The Council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes with site capacity to accommodate more than 10 dwellings, having regard to: (a) Policy SP2 and the achievement of the Borough-wide target of 40% affordable housing provision...”

The viability report suggests construction at £3419/sqm GIA for the residential portion. Benchmark prices indicate these values would be in the top 10% of build costs compared to typical £2000/sqm GIA for 3-5 storey flats with lift in the UK. Even a small change to this construction cost rate reverses the outcome of the viability appraisal. The applicants should provide information to support such high construction costs.

18. Community engagement / consultation:

Haringey DPD Policy DM1 Haringey Development Charter: “(A) All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria: (c) Confidently address feedback from local consultation;”

Planning statement states community engagement prior to submission but applicants first submitted (and appear to have withdrawn) in Sep 2023 as per the application form whilst a single community engagement event took place in Jan 2024.

19. Application Information:

The application information appears contradictory or to be missing important information in some places:

Application form: does not appear to align with the current proposals for example the form states 13 flats but application shows 12.

Planning Statement: contains various inconsistencies e.g.

- refers to “current appeal” (p.5 item 4.4). This is confusing since a “planning appeal” has a specific meaning and the current application does not appear to be a planning appeal.
- refers to “the approved scheme on the site” (p.14 item 5.24) having previously stated there is no relevant planning history and there does not appear to be an existing approved scheme.
- states all flats are wheelchair adaptable (p.15 item 5.30) but this would typically be read as Building Regulation type M4(3)(2)(a) not the M4(2) type for generally accessible (e.g. limited mobility) and adaptable (e.g. changing needs as occupants age) that is being provided.
- says it is considered that the scheme complies with external amenity space requirement (p.16 item 5.31) and that flats comply with size requirements but see comments on balcony and dwelling sizes above.

Design & Access Statement: contains various inconsistencies e.g.

- refers to aluminium composite cladding at sixth floor (text p.25) whilst it provides a photo of zinc (bottom right p.25) and drawings indicate zinc (drawing 1544/07) and there are no fifth or sixth floors.

- Schedule of accommodation (p.33) does not match areas shown on plans (drawing 1544/05) e.g. Flat 7
- says all flats are “wheelchair adaptable” (p.23) with the same issue as noted under planning statement above.

Site boundary: ref drawing 1544/05 Ground Floor Plan as Proposed: the building appears to overstep the site boundary to the right of the residential entrance.

Insufficient survey: there does not appear to be any survey of east or west elevations of 10 Bedford Road / Palace Mansions or of 15-19 Bedford Road to allow proper assessment of heights, alignment of proposed elevations with neighbours.

Basement: no basement plan provided.

Mechanical plant: no indication of mechanical plant size to basement or roof.

Insufficient streetscape context: the application does not provide context elevations to show how the building fits into Bedford Road and Alexandra Park Road (drawing 1544/11). For example, there are no elevations showing 15-19 Bedford Road or 349-357 Alexandra Park Road with the proposals.

Inconsistent perspective: The proposal appears to be incorrectly composited into existing photographs giving potentially misleading impression of the height of the development e.g. from drawing 1544/10



In conclusion, given the numerous substantive issues noted above, I believe the council should refuse this application.

Yours sincerely

Henry Simon