

Dear Valerie Okeiyi

Re: HGY/2023/2584 13 Bedford Road London N22 7AU

I have read the Briefing to Committee for the above application presented to the 4th March 2025 planning sub-committee meeting and watched the recording of the meeting. At the meeting, the applicant's agent referred to documents that are not available on the Haringey Public Register page for this application. I note that new and revised documents were uploaded on 7th, 9th and 11th July 2025 but these still do not include the following. Please can these documents be made available as soon as possible or sought from the applicant:

- Crime prevention statement;
- Planning consultant's response to objections;
- Any details on proposed wall, floor and roof build-up that the applicant has provided to support their statement that the proposals would include "*high levels of fabric insulation*"; and
- Any other revised or additional documents submitted by the applicant.

There remain significant issues with the proposals included in this application that are unaddressed—or only partially addressed—in consultee responses and available information from the applicant. Many of these issues were highlighted in my original objection to the application on 9th August 2024. I reference that objection throughout this letter but do not repeat its contents in detail.

1. Height

- 1.1. No argument has been made for why the proposed building should be taller than local buildings, highlighted in my original objection. The proposed building is higher than:
 - 1.1.1. - any residential building within 450m. The new Aaron Gayle Court residential tower is 450m away on Trinity Road and Partridge Way. Its height can be justified by its local setting: set back from Bounds Green Road, a wide major road, with nearby existing towers Finsbury House and Newbury House, all set in open ground.
 - 1.1.2. - any building within 300m. Heartlands High School is 300m away. Its height can be justified by its size (over a thousand students) and its location on the edge of a light industrial area, away from houses and surrounded by trees.
- 1.2. Due to the proposals' position on the corner, the slope of Alexandra Park Road and the open view across the railways lines, the set back of the top floor is ineffective in reducing the apparent height of the building. Below are approximate views with the proposed building highlighted in red.



Fig. 1a view north along Bedford Road



Fig. 1b view west across railway lines from Buckingham Road



Fig. 1c view south-west from the corner of Buckingham Road and Bridge Road

2. Building line

- 2.1. No argument has been made for why the proposals should ignore building lines along Alexandra Park Road and Bedford Road, highlighted in my original objection. Below is an approximate view showing the proposed building would project well beyond other buildings on Alexandra Park Road. See also Fig. 6a, 5b, 5c showing building visibility along Alexandra Park Road and Fig. 1a above showing the proposed building projecting beyond buildings on Bedford Road.

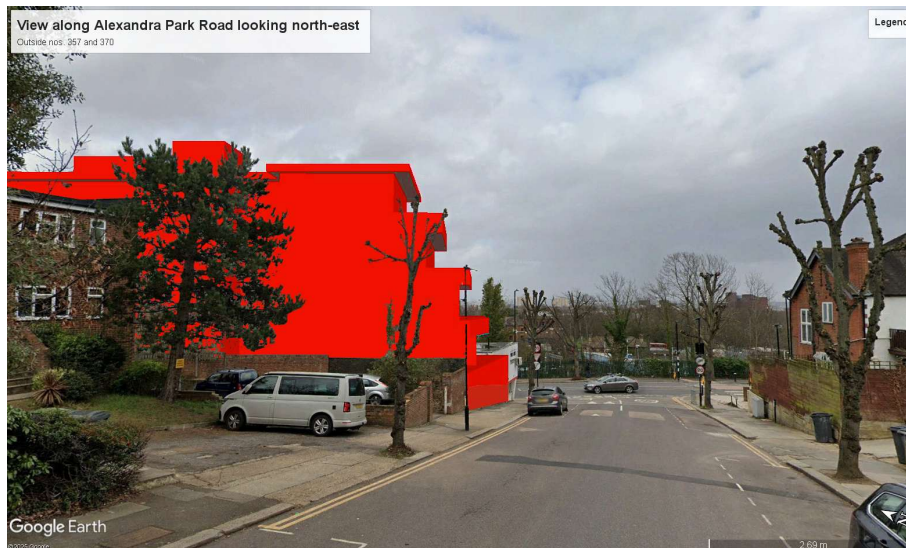


Fig. 2 view looking north-east from outside nos. 359/357 Alexandra Park Road

3. Character

- 3.1. No argument has been made for why the proposed building should ignore its context, with storey heights and window treatment that do not relate to existing buildings and insufficient measured survey, highlighted in my original objection.

4. Elevations

Most items highlighted in my original objection are still unaddressed. See attached mark-up of revised elevations 1544/07 rev E.

- 4.1. Issues with the elevation design, highlighted in my original objection, have not been addressed. Additional items:

- 4.1.1. - No information is provided to show detail and material of shop signage. Its interaction with recessed RWPs appears clumsy.
- 4.1.2. - No material indicated for balcony soffits. Detail of abutment between brickwork and soffits to balconies at south end of proposals differs from recessed balconies in CGIs.
- 4.1.3. - Bin store door threshold to residential store is not level in elevations and CGIs despite Chris Georgiou's email 09 July 2025 12:26.
- 4.1.4. - Some brick is still labelled as buff in key and across various elevations.
- 4.1.5. - The top floor and some balcony elements are labelled as retractable awnings when it appears to be zinc cladding.
- 4.1.6. - The top floor access corridor to the west elevation has been enclosed, giving an awkward cantilever appearance and simplistic aesthetic, looking like building site cabins.
- 4.1.7. - The layout of cantilevered hit-and-miss or honeycomb brickwork to west elevation appears to have changed but this is not labelled on elevations and detail is not explained. The increased extent of cantilevered brickwork also worsens the climbing risk.
- 4.2. The proposed west elevation does not resolve the interacting issues of security, privacy, fire, daylight/sunlight and appearance and is highly visible since it projects beyond the Alexandra Park Road building line, see fig.2 above and items 5 to 9 below.

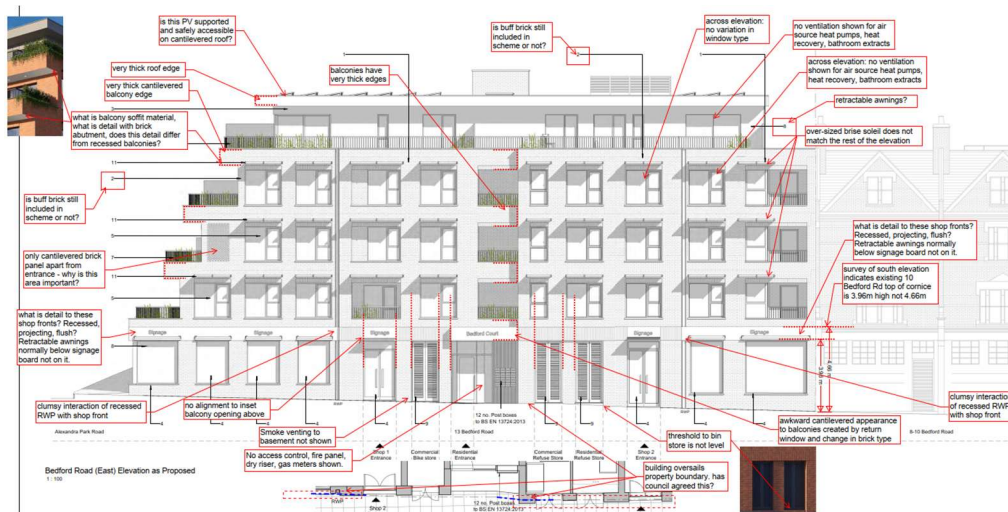


Fig. 3a mark-up of applicant's east elevation submitted with this objection

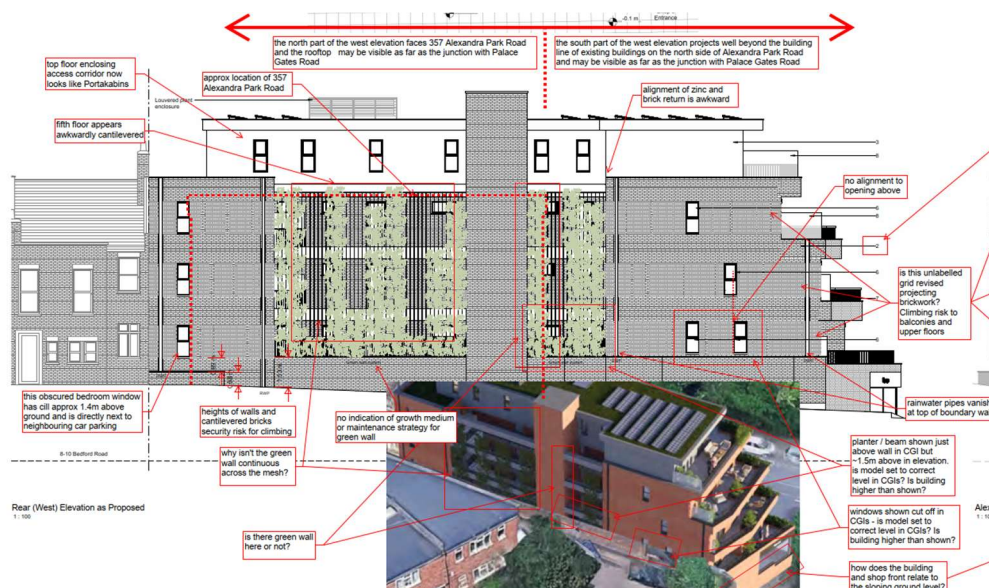


Fig. 3b mark-up of applicant's west elevation submitted with this objection

4.3. Roof edges already appear chunky as highlighted in my original objection. Roofs, floors and access decks are shown 500mm thick throughout. It is unlikely that build-up of green roof / decking, drainage falls, insulation, structure and ceiling void (presumably to include ventilation ducts) can fit within this depth. If the thickness had to be increased then the current views give a misleading impression of the proposal, and resolving this would risk worsening its chunky appearance and further increasing its overall height (ref 1544/08).

4.4. The Quality Review Panel (QRP) had limited opportunity to consider the design but noted several issues that do not appear to have been addressed in the revised drawings, such as size of windows facing balconies. Given the issues noted in 4.1 to 4.3 above, the QRP should have an opportunity to comment further.

5. Roofscape & green wall

- 5.1. Access for maintenance to the green roofs and walls is still not clear, highlighted in my original objection.
- 5.2. The Quality Review Panel made a large number of recommendations on green wall and green roof design including appointment of a landscape designer. It is not clear these have been implemented in revised information.
- 5.3. In the revised proposals, the planters are arranged as free-standing beams with the highest being two storeys above the flat roof to the shops.
 - 5.3.1. - How will these planters be safely maintained?
 - 5.3.2. - How are they structurally supported?

- 5.3.3. - What is the element at the fourth floor level that looks like another planting trough?
- 5.3.4. - What material are the planting troughs?
- 5.4. Visuals and elevations of the green wall are inconsistent, showing vegetation in different positions and only partially covering the mesh.
- 5.5. The green wall needs significant design work:
 - 5.5.1. - The revised Design & Access Statement p.33 refers to “*climbing plants, ultimately covering the entire elevation*”. How would the green wall’s use as a privacy barrier between the proposed building and 357 Alexandra Park Road be ensured on day one if it does not cover it the entire elevation from the outset?
 - 5.5.2. - How would proper maintenance be guaranteed for the life of the building? Failure would compromise privacy and poorly maintained green walls can present a fire risk.
 - 5.5.3. - How would security be ensured and climbing prevented?
 - 5.5.4. - Does the green wall present a fire hazard to users of the car parking to the west? Is it vulnerable to arson? It appears the green wall should be considered an external wall and hence subject to the requirements to prevent fire spread over external surfaces; does the proposed green wall system achieve Class A2-s1, d0 (limited combustibility, very little or no emissions, no burning droplets) or better? (Ref Building Regulations Approved Document B2 Table 12.1.)

6. Security & Secured by Design

- 6.1. No explanation has been provided of how climbing the west boundary would be prevented, highlighted in my original objection.
- 6.2. The car parking area that serves no.10 Bedford Road and beyond is currently poorly overlooked and is sometimes the site of antisocial behaviour such as public urination and noisy groups gathering late at night. This area would be further enclosed by the proposed building, with poor oversight from surrounding buildings.
- 6.3. It is not clear the Designing Out Crime Officer (DOCO) has been able to review climbing risks to the west and south elevations or arson risks to the west elevation, given that the applicant has not met with them and the officer’s accordingly limited response to the planning application.

7. Fire safety

- 7.1. Fire statement vs drawings - building control appears only to have reviewed the applicant’s *Planning Fire Statement* and not the drawings but **the drawings do not conform to the fire statement**, highlighted in my original objection.

8. Daylight/sunlight

Ref Daylight, Sunlight & Overshadowing Assessment

- 8.1. Whilst I look forward to the expert review of the submitted daylight/sunlight report, I note that issues highlighted in my original objection do not appear to have not been addressed.
- 8.2. The submitted east and west elevations of no.10 Bedford Road are not based on surveys (ref 1544/07) so it is not clear that the daylight/sunlight surveys are based on surveyed window positions.
- 8.3. The assessment does not include the ground floor window below Win03 to no.10 Bedford Road (ref Table 1 and Fig 3).
- 8.4. There appear to be errors in the assessment for example in Table 1:
 - 8.4.1. - difference column appears to be wrong for Win03 & Win04,
 - 8.4.2. - post-development VSC is **greater** than pre-development for Win01 & Win02, and
 - 8.4.3. - reductions in VSC for Win01, Win02 & Win03 do not appear plausible. These windows are currently unobstructed whilst the proposed building would completely block them.

- 8.5. There is no daylight and sunlight analysis for rooms within the proposed building, highlighted in my original objection. The Quality Review Panel anticipated this analysis (*ref Report of Small Site Review Meeting HQRP143_13 Bedford Road* p.6). It appears many rooms would have poor lighting due to recessed balconies, obscured glazing and the proximity of the green wall and lift core.
- 8.6. The north end of the fourth floor has moved 0.5m northwards in revised 1544/06D floor plans. The daylight / sunlight assessment must be updated to reflect this.

9. Privacy

- 9.1. No explanation has been provided of how the maintenance and density of the green wall would be guaranteed to control privacy towards neighbouring buildings. No explanation has been provided as to how balconies immediately adjacent to the open air access corridor would maintain privacy within the development. The marked-up extract of the first floor plan below highlights privacy issues typical at every floor.

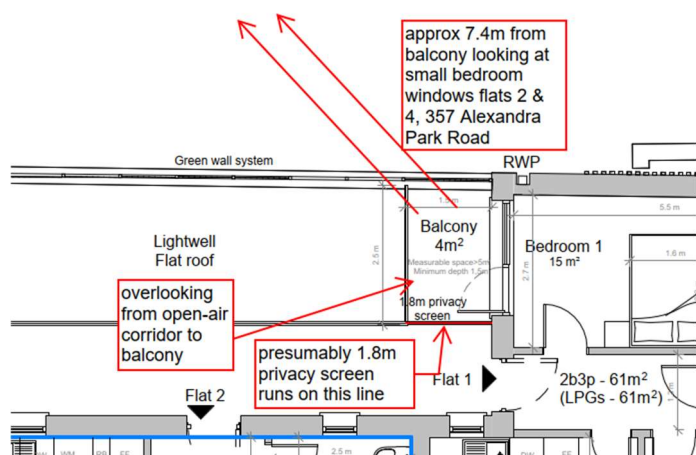


Fig. 4 mark-up of applicant's first floor plan noting overlooking and privacy issues

10. Dwelling design

- 10.1. Issues with dwelling design, highlighted in my original objection, have not been addressed.
- 10.2. Layouts of flats do not meet minimum standards as set out in London *Housing Design Standards LPG 2023* (LHDS) and DCLG (now MHCLG) *Technical housing standards – nationally described space standard* (NDSS), highlighted in my original objection:
 - 10.2.1. - Insufficient built-in storage, highlighted in my original objection. Specifically LHDS and NDSS requirement is for 2sqm storage for 2 bed spaces plus 0.5sqm for each additional bed space over 2. Only 7 of the 12 flats have any built-in storage, all of the indicated built-in storage is smaller than the minimum standard (ref LHDS table A1 and NDSS Table 1).
 - 10.2.2. - Kitchens are undersized, highlighted in my original objection. Specifically LHDS sets out the required length of kitchen worktop depending on numbers of bed spaces. Flat 10 is grossly undersized (approx 4.3m long vs 6.73m required). Multiple other flats have undersized kitchens including flats 1, 4, 5, 8, 10, 11, 12 (ref LHDS table A2.1, kitchen, item 8).
 - 10.2.3. - The required full sets of furniture are not indicated – e.g. desk and chair, chest of drawers to all bedrooms, occasional tables & storage units to living rooms (ref LHDS Table A2.1).

11. Internal design to communal and circulation spaces

- 11.1. Issues with communal and circulation spaces have not been addressed, particularly accessibility and circulation clashes and lack of service runs, highlighted in my original objection.

12. Accessibility

Issues with accessibility, highlighted in my original objection, have not been addressed.

12.1. M4(3) flat, ref Building Regulations Approved Document M (BRADM):

- 12.1.1. - Communal doors do not provide the required 300mm leading edge e.g. door to lift lobby next to flat 2.
- 12.1.2. - Neither clear landing 1500 x 1500mm in front of lift (as BRADM2 diagram 11) nor 1570mm long space between door swings (ref BRADM2 item 2.29) is provided – door swings and stair users would clash with stationary wheelchair users.
- 12.1.3. - The 300mm nib to the front door is not maintained for 1800mm (ref BRADM1 item 3.22e), making the hall hard to navigate for a wheelchair user.

13. Outdoor amenity space

- 13.1. Some balconies are undersized, highlighted in my original objection. Specifically London *Housing Design Standards LPG 2023* (LHDS) requires (a) at least one 5sqm min balcony, (b) total balcony area of min 5sqm for 2 bed spaces plus 1sqm for each additional bed space, and (c) min 1.5m depth. Flat 3 has a balcony approx 3m wide x 1.4m deep = 4.2sqm, so both the area and depth are insufficient. Dimensions shown on plan often go beyond the floor area to centres of upstand walls e.g. front balconies to flats 1, 2, 3, 5, 6, 8 & 9. Multiple balconies are undersized or insufficient for the numbers of bed spaces including flats 3, 5 & 8. LHDS requires that inset balconies should be wider than they are deep but this is not the case for flats 2, 6 or 9. Ref LHDS item C10.1 incl notes 1 & 2.
- 13.2. The only balconies to units 2, 3, 6 and 9 and the main balconies to units 1, 5 and 8 face onto Bedford Road with railway, W3 bus route (a double-decker, running from 5am until past midnight), frequent traffic jams into the roundabout at the junction of Bedford, Buckingham and Palace Gates Road with associated noise and pollution limiting use of these balconies.

14. Housing mix

- 14.1. It is not clear why these proposals do not need to meet either Haringey or London unit mix requirements, as my original objection.

15. Noise and smells from the proposals and mechanical plant

- 15.1. Whilst I look forward to the council's review of the applicant's *Planning Noise Report*, the applicant has still not provided any information on noise or smells arising from the proposals, as my original objection.
- 15.2. Location of sprinkler tanks is not indicated: there could be a significant impact to the proposals' appearance if tanks are positioned on roof and flood risk may make the basement unsuitable.
- 15.3. Commercial units:
 - 15.3.1. - No risers are shown for any plant runs from commercial ground floor to roof, so it is unlikely that food preparation is feasible.
 - 15.3.2. - Some uses may present a noise nuisance if operated early morning or into the evening, for example gym or dance studio that might fall under "indoor sport and recreation".

16. Transport

- 16.1. The applicant has not addressed the cycle parking design issues, highlighted in my original objection, including door width, insufficient clearance between bike rack and walls, insufficient space for users
- 16.2. TfL state they are satisfied with the number of cycle parking spaces but they do not appear to have assessed the layout which does not work as drawn, highlighted in my original objection.

- 16.3. Haringey Transportation Team have commented and noted numerous issues. Since changes to the cycle store to accommodate these comments would reduce the size of commercial units these would be material changes. Therefore compliance should not rely on planning conditions.
- 16.4. Residential cycle parking store is not large enough to maintain the minimum required number of spaces and accommodate the TfL requirement for larger / adapted cycles like handcycles, tricycles, tandems, models adapted to suit the rider's specific needs or cargo cycles.
- 16.5. It appears impractical for shop customers (short stay commercial users) to use the commercial cycle store:
 - 16.5.1. - How would it be secured?
 - 16.5.2. - If locked, how would customers access the store without leaving their bike unsecured on the street to request access?

17. Viability

- 17.1. I look forward to the council's review of the applicant's viability statement.

18. Engagement

The applicant has been slow to engage at all stages of the design and application process as indicated by:

- 18.1. Their late, single engagement meeting with the community in Jan 2024, only after this application had been submitted and 3 years after submitting a pre-app in Jan 2021 (ref Design & Access Statement p.15). The applicant has not provided a link to a website to view the proposals and provide comments (referenced in briefing report to 4th March 2025 committee, item 6.1).
- 18.2. Lack of engagement prior to application:
 - 18.2.1. - No meeting with the Designing Out Crime Officer to discuss Secured by Design.
 - 18.2.2. - Late meeting with the Quality Review Panel on 20th November 2024, 14 months after submission.
 - 18.2.3. - Late meeting with the planning sub-committee, 18 months after submission. It is not clear why the applicant was not able to present the proposals prior to application.
 - 18.2.4. - No engagement with the Development Management Forum even though the proposals are for more than 10 residential units and more than 1000sqm floor space.
- 18.3. No attempt to contact direct neighbours to discuss daylight, privacy or security issues.
- 18.4. Lack of contact with Alexandra Park and Palace Charitable Trust as reflected in the Trust's comments on the planning application.

19. Application information

- 19.1. Appearance / streetscape – streetscape elevations showing wider context have not been provided, as highlighted in my original objection (ref 1544/07E). Committee members have also called for drawings / perspectives that better illustrate the height of the proposed building (ref committee recording <https://youtu.be/o7d6hMDzNTE> at 2:13:42). The revised CGI sheets do not do that, since they do not show street level views with sufficient surrounding context. In addition there are no perspectives for critical views (ref 1544/10 rev D, 1544/11 rev C, Design & Access Statement p.27-30) such as:
 - 19.1.1. - Crossing the road bridge over the railway.
 - 19.1.2. - Crossing the footbridge over the railway.
 - 19.1.3. - From other side of railway e.g. from The Starting Gate pub.
 - 19.1.4. - Further along Alexandra Park Road e.g. outside nos. 337 & 360 where the top of the building would still be visible. See fig. 6a, 6b and 6c below.
 - 19.1.5. - Along Bedford Road e.g. outside no. 19. See fig. 1a above.

- 19.2. Many of the views that are provided are still too tightly cropped, omitting the surrounding buildings or failing to show their full heights e.g. drawing 1544/10 rev D views A, B and 1544/11 rev C, Rear view_Alexandra Park Road.
- 19.3. The lack of views and elevations showing the proposed building in its surrounding context means that the QRP were missing important information on the proposals when they considered its size. See approximate views throughout this letter of proposals in context showing its excessive height and mass.

20. Biodiversity loss

- 20.1. No assessment of impact on the tree to the south of the proposal, at the east end of Alexandra Park Road (at 51.597975 north, -0.121570 west). This tree would be immediately adjacent to balconies at 1st and 2nd floors. The tree is shown at different heights in CGIs on 1544/10 rev A “View A” and “Street Scene” on the Public Register page.

21. Additional consultation prior to decision

Consultees, including the Quality Review Panel (QRP), have recommended additional consultation prior to application or prior to decision. No evidence of this consultation is available on the Public Register page for this application.

- 21.1. The QRP required the appointment of a landscape designer prior to application to aid in the design of the green wall & roofs. This suggests the QRP was not aware that the application had already been submitted. No landscape design has been presented.
- 21.2. The QRP requires further details on several items (environmental sustainability, future-proofing commercial units, contribution to biodiversity net gain, details of green roof and PVs).
- 21.3. The QRP also noted details and tests are required:
- 21.3.1. - on achieving BREEAM Excellent.
- 21.3.2. - daylight and sunlight analysis of flats within the proposal.
- 21.4. In their comments on the application:
- 21.4.1. - Haringey Council Flood & Water Management Lead states “*As a part of the Full planning application, we would require [calculations, data and modelling demonstrating compliance]*”. Since this is a full application presumably these requirements apply now.
- 21.4.2. - TfL have stated that the applicant should “*demonstrate that parking onsite is not feasible*” to show why on street parking is necessary for a blue badge space.

22. Site boundary

- 22.1. The building oversales the site boundary along the east elevation as shown on floor plans with no evidence that the applicant plans to purchase this land.

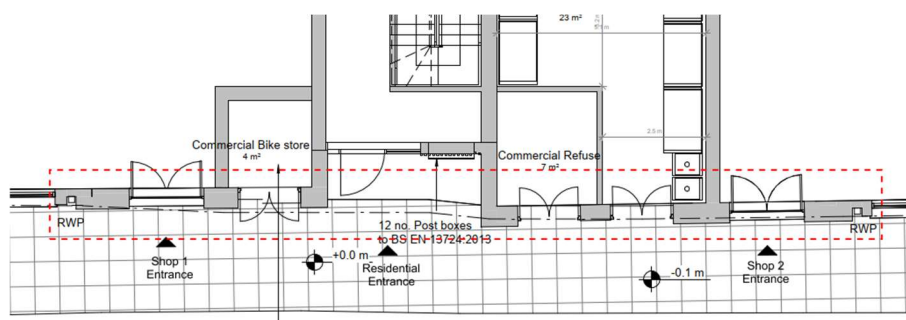


Fig. 5 extract of 1544/05E ground floor plan showing building footprint outside site boundary, taking part of public footpath

23. Applicant's presentation to the committee

The applicant's presentation to the committee on 4th March 2025 contained inaccuracies noted below, with reference to video timecodes (ref <https://youtu.be/o7d6hMDzNTE>):

1:53:40 *"building heights in the area tend to be three or four storeys"*

The majority of buildings within the area are 2 or 3 storeys (as officer's presentation 1:33:00) with 3rd storeys generally in roof slopes.

1:55:10 *"there are minimal views from the west along Alexandra Park Road due to the built form along the street and the site is only clearly visible in close proximity"*

Due to the height of the proposals and because it projects beyond the existing building line, the proposals could be visible most of the way up Alexandra Park Road to the junction with Palace Gates Road, across the railway lines and along Bedford Road. See approximate views throughout this letter. Below are approximate views along Alexandra Park Road with the proposals in red and its outline where hidden by trees or existing buildings.



Fig. 6a view from outside nos. 307 & 336 Alexandra Park Road looking east



Fig. 6b view from outside nos. 337 & 358 Alexandra Park Road looking east



Fig. 6c view from outside nos. 347 & 364 Alexandra Park Road looking east

1:59:25 *"[the flats] are well laid out and they provide a comfortable living environment all are in line with the London plan design guide requirements"*

Layouts do not include the required storage or kitchen design or show the full sets of furniture required by the London Housing Design Standards LPG. See item 10.2.1 , 10.2.2 and 10.2.3 above.

2:01:16 *"the building will comply with all Secured by Design requirements as set up by the crime prevention statement which has been submitted with this application and is in line with crime prevention guidelines"*

There are issues with climbing, lack of overlooking and vulnerability to arson. See item 6 above. No crime prevention statement is available on the Public Register page for this application.

2:02:01 *"calculations demonstrate ... the proposed scheme will not impact the daylight levels for the neighbouring habitable rooms [and] the assessment ... indicates that the proposal will not cause a change in light levels to occupants located nearby"*

The daylight/sunlight report misses multiple neighbouring windows. See item 8 above.

2:04:27 *"the applicant has engaged with a car club operator who has confirmed they would be able to provide free membership to residents of the local zip car club"*

Note that this is limited to 3 years' free membership and the car club operator only commits to running the scheme for 3 years, so there is no guarantee that future residents would be offered free membership. See Transport Statement appendix B.

2:10:30 *"the building is more or less in line with the height of the adjoining terrace"*

The proposed building is a full storey higher than the ridge of the pitched roof of the adjoining building as noted by Councillor Buxton at 2:14:25.

2:10:50 *"all the other buildings to the south and to the west of the site are higher due to the incline of the road"*

The proposed building is a full storey taller than buildings to the south and to the west even taking into account the slope of the hill. See also item 19.4 above. The approximate view below shows that the proposed building is higher than buildings to the south. Buildings to the west are fully masked by the proposals.



Fig. 7 view of east of proposed building in context with surrounding buildings on Bedford Road

In conclusion, given the numerous substantive issues noted above, and as my original objection to the proposals on 9th August 2024, I believe the council should refuse this application.

Yours sincerely

Henry Simon
Enc.

Appendix

Reference information for 4th Mar 2025 planning sub-committee

Video recording: <https://youtu.be/o7d6hMDzNTE>.

- Discussion on 13 Bedford Rd starts at 1:30:29
- The applicant's agent's presentation starts at 1:51:20
- Councillors' questions to the architect start at 2:06:10

Briefing to Committee report including notes from design Quality Review Panel:

<https://www.minutes.haringey.gov.uk/documents/s150045/March%202025%20FINAL%20committee%20briefing%20-%2013%20Bedford%20Road.pdf>

Documents, agenda etc.:

<https://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=728&MIId=10983&Ver=4>

Minutes:

<https://www.minutes.haringey.gov.uk/documents/s150716/4%20Planning%20minutes%20-%20draft%204.03.25%20draft%201ks.pdf>.

Reference information for planning application HGY/2023/2584, 13 Bedford Road, London, N22 7AU
Haringey Public Register page with applicant's drawings & reports, consultees comments and objections etc.:

<https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000005UFNoAAO/hgy20232584>

Consultees' comments generally:

<https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000005UFNoAAO/hgy20232584?tabset-3892f=2>

Consultees' comments, where attached as documents

- Comments from the Metropolitan Police Designing Out Crime Office
<https://publicregister.haringey.gov.uk/pr/sfc/servlet.shepherd/version/download/068Tu0000B40eFIAR>