

Formal Objection Letter: Harcourt House Energy Strategy Review and Non-Compliance on Fourth Revision of Energy Statement (Ref: JF458-RP-Z-0001)



Planning Service
London Borough of Haringey
L6 River Park House
225 High Road
Wood Green
N22 8HQ

05 August 2025

Dear Council,

Development at Harcourt House N8 9JB
Planning application reference: HGY/2024/0921

We write to raise a formal objection to the above application on energy and carbon grounds, specifically in reference to the applicant's latest Energy Statement (Rev 4, dated June 2025).

Despite four attempts, the applicant has failed to provide an Energy Statement and supporting information that is complete, accurate or consistent with proposed design. Crucially, even with these deficiencies, it fails to meet Haringey and London Plan policy requirements in the following key areas:

1. Missing, Inaccurate and Misleading SAP Calculations

- a. The Energy Statement states: "For the purposes of this report, and to satisfy the above principles, regulated carbon emissions for the units have been derived from a calculation developed via Elmhurst Design SAP10." This SAP10 is dated 1 August 2024, is not in line with the latest design, contains multiple input errors regarding areas, openings, energy use, overstated generation and carbon use calculations. A lot of this has been highlighted in a previous report and by other objectors multiple times.

- b. As one example: The SAP calculation sheets used are inconsistent with the architectural drawings (Rev C). Floor areas used in SAP (63.3 m²) do not match the GIA stated on plans (54.2 m² and 53.4 m²). SAP calculations for both dwellings, units 1 and 2, use the same TFA (63.3 m²), despite the units having different dimensions. Another example is the number of openings in the flat roof area recorded as 0 for both flats. See Appendix.
- c. Through FOI requests, it is clear that the Haringey Carbon team have repeatedly requested additional SAP worksheets (Be Lean) but they have not been provided or corrected.
- d. This means that despite this being the fourth revision of the Energy Statement, and these issues being brought-up during the first public consultation, the SAP10 values that are used to derive the calculations for sustainability and energy strategies are outdated, misleading and inconsistent with proposed designs, and the veracity for any statements of scheme's compliance with policy requirements cannot be established.

2. Failure to demonstrate 20% carbon reduction through on-site renewable energy generation

- a) The NPPF states: "Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels)."¹ MSC, a UK standards body for renewable and low carbon technology maintains that EAHP is not a source of renewable energy.
- b) Part (d) of the Haringey Local Plan Policy SP4 of outlines the following requirement: "All new developments will be required, where viable, to achieve a reduction in predicted carbon dioxide emissions of 20% from onsite renewable energy regeneration, which can include connections to local sources of decentralised renewable energy." This has also been noted and required by the Haringey Carbon team for this application. The carbon savings through renewable energy are recorded as "Regulated Carbon dioxide savings from Renewable Energy 'Be Green'".

¹ NPPF, Annex 2, Glossary

- c) A PV array is proposed with unrealistic and non industry standard calculations for outputs and carbon factors. We have supplied detailed comments in our previous report. The results of this idealised scenario do not match PV generated values in SAP10 calculations.
- d) However this is irrelevant as the Energy Statement concludes: “An appraisal into viable renewable technologies was conducted to identify where green technologies could be installed, offering a displacement in energy and residual carbon emissions. The study proved that PV was the best option. However, with site restraints, conservation issues and the low yield of the PV, this has been discounted” Consequently, Page 18, Table 4, of the Energy Statement clearly shows zero contribution from the PV system: “Savings from ‘Be Green’: 0.00 tonnes CO₂/year, clearly failing to meet the policy requirements.
- e) Instead, the statement attempts to attribute stipulated savings from ‘Energy Efficient Features (Be Clean) as on-site renewables. The entire carbon reduction is attributed to an exhaust air heat pump (EAHP), not an on-site renewable energy. Page 5 incorrectly and misleadingly labels the EAHP as renewable technology. A heat pump is not a source of renewable energy and should not be considered towards ‘Be Green’ targets as has been previously noted by Haringey Carbon Management team’s response in June 2024 (page 6).
- f) The GLA’s 2022 Energy Guidance is explicit: a 20% reduction in emissions from on-site renewables is required. This application does not meet that threshold.

3. Missing Required Evidence

- a) GLA Guidance clearly states that “for the avoidance of doubt, energy assessments should: (...) demonstrate that the cooling hierarchy has been followed and include information demonstrating that the risk of overheating has been mitigated through the incorporation of passive design measures”². The overheating assessment has also been requested multiple times by the Haringey Carbon team and not provided.
- b) The Energy statement states that regarding overheating “The initial model shows that there were minor overheating risks and that only section 1a of the Part O Criterion was failing, when applying a Simplified Part O method. This is due to the amount of glazing compared to floor area, window opening amount and site

²GLA Energy Assessment Guidance, June 2022, 1.7

location.” and suggests to “see the appendices for the detailed Part O Assessment”. No such study of overheating risk assessment has been provided, in breach of London Plan Policy SI 4. Evidence for overheating risk mitigation was requested by the Haringey Carbon Management team in their response dated June 2024.

- c) Overheating mitigation recommendations were to review thermal mass and passive shading enhancements. Both of these are material planning considerations that will affect the appearance and size of the proposals located in the conservation area. The details should be sought and provided to mitigate overheating.
- d) No details are provided on thermal continuity at junctions between new and existing elements.
- e) The statement proposes that 100% of heating and hot water demand will be supplied by EAHPs. This is a very ambitious target. No evidence has been provided for locations, models or specifications for these units. No information exists for ducting for air intake and supply to all rooms in already very restricted heights, raising questions for their viability. Though not normally required at the planning stage, this information should be provided upfront to demonstrate viability given the sensitivity around the height of the proposed development and the already limited ceiling height in the flats.

4. Further Issues regarding PV Panels

- a) No evidence or calculations have been provided to support unrealistic estimated solar generation figures detailed on page 16. As explained in our previous report, the estimated PV power generation is around 2,649 kWh using industry established methodology (MCS Standard Estimation Method), which is significantly less than the claimed 3,604 kWh by the applicant.
- b) The following are stated as Design Considerations in the applicant’s Energy Statement for the proposed PV array:
 - “ • Optimise the PV array by designing with the best inclination and orientation.
 - Ensure that the panels receive minimal over-shading.

- Ensure that the wiring from arrays is kept to a minimum, to reduce electrical losses.
 - Provide safe and secure access for maintenance purposes.
 - Ensure regular monitoring of performance.”
- c) The panels are proposed at an 8° incline, which is insufficient to ensure self-cleaning by rainfall. This would likely lead to reduced performance over time, unless regular manual cleaning is arranged. No provision for access or maintenance has been included in the design although they are design considerations. They are also material planning considerations as they will affect the layout and appearance of the roof plans. Similarly the location, incline and shading of the panels have not been considered. Please see the previous report for details regarding these issues.
- d) Despite requests from the Haringey Carbon team, and it being a requirement of GLA Energy Assessment Guidance, no energy storage location or details for PVs has been provided.

The Energy Statement (Rev 4) continues to fall short of the quality and policy requirements set by the London Plan and other relevant policies. The application fails to demonstrate carbon compliance, relies on outdated and incorrect data, and continues to make contradictory and unsupported claims. These repeated failings, now present across four iterations of the Energy Statement, represent a pattern of non-compliance that undermines the integrity of the planning process.

We respectfully urge the Planning Officer and Haringey Carbon Team to review and withdraw support for this application on energy and sustainability grounds.

Sincerely,

Dr. Mauricio Aguilar Cardenas

Technology Director and SAP Assessor

Cook & Cardenas Ltd. Newminster House,

29 Baldwin Street, Bristol, BS1 1LT

mauricio@cookcardenas.co.uk

Appendix - Examples of incorrect input data in the SAP calculations attached to version 4 of the sustainability statement (wrong area, window orientation, openings) highlighted in red.

Summary for Input Data

Property Reference	Unit 1 - Harcourt House		Issued on Date	01/08/2024	
Assessment Reference	Unit 1 - Harcourt House - GREE	Prop Type Ref	UNE 1 Sample		
Property					

SAP Rating	81 B	DER	5.13	TER	14.01
Environmental	96 A	% DER < TER		63.38	
CO ₂ Emissions (t/year)	0.3	DFEE	32.44	TTEE	35.54
Compliance Check	See BREL	% DFEE < TTEE		8.72	
% DPER < TPER	27.52	DPER	54.04	TPER	74.56

Assessor Details	Mr. Lee Pasifil	Assessor ID	Y856-0001
Client			

SUMMARY FOR INPUT DATA FOR: New Build (As Designed)

Orientation

Property Tenure

Transaction Type

Terrain Type

1.0 Property Type

Position of Flat

Which Floor

2.0 Number of Storeys

3.0 Date Built

3.0 Property Age Band

4.0 Sheltered Sides

5.0 Sunlight/Shade

6.0 Thermal Mass Parameter

Thermal Mass

7.0 Electricity Tariff

Smart electricity meter fitted

Smart gas meter fitted

West

ND

6

Suburban

Flat, Semi-Detached

Top/floor flat

4

1

2024

L

2

Average or unknown

Precise calculation

N/A kJ/m²K

Standard

Yes

Yes

7.0 Measurements

	Heat Loss Perimeter	Internal Floor Area	Average Storey Height
Basement:	0.00 m	0.00 m ²	0.00 m
Ground floor:	30.08 m	63.31 m ²	2.50 m
1st Storey:	26.38 m	49.04 m ²	2.85 m
2nd Storey:	0.00 m	0.00 m ²	0.00 m
3rd Storey:	0.00 m	0.00 m ²	0.00 m
4th Storey:	0.00 m	0.00 m ²	0.00 m
5th Storey:	0.00 m	0.00 m ²	0.00 m
6th Storey:	0.00 m	0.00 m ²	0.00 m
7th Storey:	0.00 m	0.00 m ²	0.00 m

8.0 Living Area

23.20 m²

9.0 External Walls

Description	Type	Construction	U-Value (W/m ² K)	Kappa (kJ/m ² K)	Gross Area (m ²)	Nett Area (m ²)	Shelter Res	Shelter	Openings	Area Calculation Type
Main External Wall	Cavity Wall	Cavity wall - plasterboard on dabs, AAC block, filled cavity, any outside structure	0.15	60.00	71.37	63.28	0.00	None	8.10	Enter Gross Area

9.1 Party Walls

Description	Type	Construction	U-Value (W/m ² K)	Kappa (kJ/m ² K)	Area (m ²)	Shelter Res	Shelter
Party Wall 1	Filled Cavity with Edge Sealing	Single plasterboard on dabs both sides, lightweight aggregate blocks, cavity or cavity fill	0.00	110.00	14.01	0.00	None

9.2 Internal Walls

Description	Construction	Kappa (kJ/m ² K)	Area (m ²)
Internal Wall 1	Plasterboard on timber frame	9.00	40.27

10.0 External Roofs

Appendix - Examples of incorrect input data in the SAP calculations attached to version 4 of the sustainability statement (wrong area, window orientation, openings) highlighted in red.

Summary for Input Data



Description	Type	Construction	U-Value (W/m²K)	Kappa (kJ/m²K)	Gross Area(m²)	Nett Area (m²)	Shelter Code	Shelter Factor	Calculation Type	Openings
External Flat Roof	External Flat Roof	Plasterboard, insulated flat roof	0.10	9.00	65.52	65.52	None	0.00	Enter Gross Area	0.00

10.2 Internal Ceilings

Description	Storey	Construction	Area (m²)
Internal Ceiling 1	Lowest occupied	Plasterboard ceiling, carpeted chipboard floor	65.52

11.1 Party Floors

Description	Storey Index	Construction	Kappa (kJ/m²K)	Area (m²)
Party Floor 1	Lowest occupied	Concrete floor slab, carpeted	100.00	65.52

12.0 Opening Types

Description	Data Source	Type	Glazing	Glazing Gap	Filling Type	G-value	Frame Type	Frame Factor	U Value (W/m²K)
New Window	Manufacturer	Window	Double Low-E Soft 0.05		Air Filled	0.68	Wood	0.80	1.30
New Door	Manufacturer	Half Glazed Door	Double Low-E Soft 0.05		Air Filled	0.63	Wood	0.70	1.00
Rooflight	Manufacturer	Roof Light	Double Low-E Soft 0.05		Air Filled	0.63	Wood	0.70	1.40

13.0 Openings

Name	Opening Type	Location	Orientation	Area (m²)	Pitch
W1 (s)	New Window	Main External Wall	South	2.40	0
W2 (s)	New Window	Main External Wall	South	5.17	0
W3 (w)	New Window	Main External Wall	East	0.53	0

14.0 Conservatory

15.0 Draught Proofing %

16.0 Draught Lobby

17.0 Thermal Bridging

17.1 List of Bridges

Bridge Type	Source Type	Length	Psi	Adjusted Reference:	Imported
E1 Steel lintel with perforated steel base plate	Independently assessed	17.51	0.05	0.05 Appendix R	Yes
E3 Sill	Independently assessed	4.00	0.05	0.05 Appendix R	No
E4 Jamb	Independently assessed	43.80	0.05	0.05 Appendix R	Yes
E5 Ground floor (normal)	Independently assessed	27.22	0.16	0.16 Appendix R	Yes
E6 Intermediate floor within a dwelling	Independently assessed	26.38	0.00	0.00 Appendix R	Yes
E14 Flat roof	Independently assessed	26.38	0.08	0.08 Appendix R	Yes
R11 Upstands or kerbs of rooflights	Independently assessed	5.76	0.08	0.08 Appendix R	Yes
P1 Party wall - Ground floor	Independently assessed	3.67	0.08	0.08 Appendix R	No
P2 Party wall - Intermediate floor within a dwelling	Independently assessed	3.67	0.00	0.00 Appendix R	No
P4 Party wall - Roof (insulation at ceiling level)	Independently assessed	4.71	0.12	0.12 Appendix R	No
E20 Exposed floor (normal)	Independently assessed	10.41	0.32	0.32 Appendix R	No

Y-value W/m²K

Description

18.0 Pressure Testing

Designed AP₅₀ m³/(h.m²) @ 50 Pa

Property Tested?

Test Method

As Built AP₅₀ m³/(h.m²) @ 50 Pa

19.0 Mechanical Ventilation

Mechanical Ventilation

Mechanical Ventilation System Present

20.0 Fans, Open Fireplaces, Flues

21.0 Fixed Cooling System

22.0 Lighting

No Fixed Lighting

Name	Efficacy	Power	Capacity	Count
LED	15.00	5.00	75.00	20

24.0 Main Heating 1

Description

Percentage of Heat %