

Please find my response regarding the unsafe and unbuildable roof access and the proposed cycle and bin stores.

Thank you for the revised elevation F-214-DR-1310-C. However, this drawing, even after three versions, remains incorrect and contradicts the finished floor levels as shown on the proposed plan CF-214-DR-1130-C. An accurate drawing would show the roof access as only one metre tall, rendering it unsafe and unbuildable.

- The third version of the proposed plan (CF-214-DR-1130-C) shows the internal roof access landing at the same level as Flat 9 (+11.330), with no indicated level change to the external landing.
- However, the same plan inconsistently shows the external landing at +10.921, which is a factual impossibility if both landings are at +11.330.
- Consequently, an accurate elevation drawing based on the plan would result in a roof access door just over one metre tall, rendering it inaccessible and unsafe.

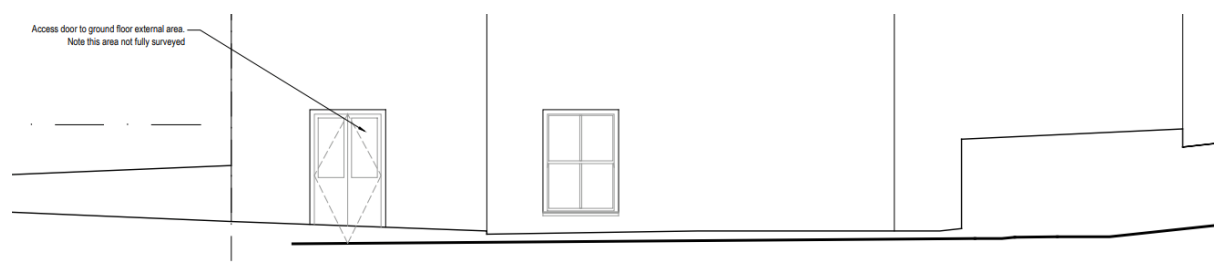
[illegible]

[Extract from the applicant's proposed plan CF-214-DR-1130-C (3rd version) - showing illogical levels]

Additionally, as we have repeatedly pointed out (refer to the [objection letter from Dr. Mauricio Cardenas](#)), the proposed fixed roof lights and PVs, with an incline of 8 degrees, will require regular cleaning and maintenance to remain functional. Planning policies and regulations mandate that designs include safe means for such regular cleaning and maintenance. The applicant's current proposals lack any provision for safe maintenance access. The council must seek further details from the applicant and Building Control regarding compliance with AD Part K, because safe and compliant means of regular maintenance access onto the top of the roof where the PVs and rooflights are located (such as an external ladders, guardrails, walkways) will materially impact the appearance of the structure, which cannot be conditioned. There is a public pedestrian and vehicular access route to Primezone Mews just below the regular maintenance access 'hatches' to the roof with no edge protection.

Proposed Cycle and Bin Stores

The applicant's current proposals for bike and bin stores remain inadequate, as they fail to account for existing level changes, landscaping, and mature greenery. It is unclear why the Council appears to be allowing the applicant to caveat drawings as "not fully surveyed" when they are proposing changes in these areas. Your planning policies require accurate surveys of existing areas to facilitate appropriate proposals. It is procedurally unacceptable that the application lacks information required from other applicants as early as the validation stage simply because the applicant refuses to provide it. How can the Council claim there is a "minor step down" to the communal garden when neither the existing nor the proposed drawings show any steps or realistic levels. What information does the Council use to form the opinion that this "minor step down would not be considered unreasonably restrictive in terms of access for the cycle storage"?



[Extract from the applicant's proposed rear elevation CF-214-DR-1320-D (4th version) - bizarre levels, no bike store]

Both existing and proposed drawings must clearly show the existing and proposed landscape, level change accurately and the proposed mitigation ramp to assess the impact on the front and rear communal gardens, particularly the extent of potential concreting over the garden for the ramp and removal of landscaping and trees. This, again has a potential negative impact to the

existing outdoor amenity and must be provided for assessment and not simply conditioned. If the proposal results in a net green loss, a biodiversity net gain report is mandatory as per your validation checklist and to comply with the Environmental Act 2021. The exemption will not apply as the proposals, if depicted, could show a loss of trees and other habitat of more than 5 linear metres.

Furthermore, Haringey Local Plan Appendix A3 of the Sustainable Design and Construction SPD, under the Waste Space Requirements section, states that "Waste container housings may need to be lit so as to be safe for residents and collectors to use and service during darkness hours." There is no provision for lighting of the new bin store, and existing hedges and landscaping will obstruct most light from the street and front entrance during darkness hours. The same issue applies to the proposed cycle store. This represents a non inclusive design oversight that contradicts your own planning policies, and the design must be improved to be acceptable.

Request for Actions and Application Status

To conclude, please compel the applicant to provide logical and buildable design drawings for roof access and safe regular maintenance provision. Please compel the applicant to provide accurate and realistic existing drawings for the front and rear gardens, and what changes to them are actually being proposed before assessing their acceptability against planning policies.

Many thanks,

Will

On Sun, 21 Sept 2025 at 22:32, Will Chan wrote:

Hi Eunice,

Thank you for your latest email.

I appreciate your acknowledgment of the active chimneys and the suggestion to safeguard future inhabitants from fumes by making the opaque window facing the wall fixed. To avoid creating a false impression of ventilation, especially given the recognised overheating risk and further compromise to the sub-standard single-aspect North-facing units, please ensure all "fixed windows" and "rooflights" are clearly marked by the applicant as such on the design drawings. I must also reiterate that there are other active flues throughout Harcourt House.

My primary concern, which remains unaddressed, is the unsafe non-compliance with Building Regulations Approved Document Part J, Diagram 17, regarding the safe location of flue openings near other structures (not just windows). I struggle to understand why the requirement for flue openings to maintain a minimum horizontal clearance of 2.3 metres **from any part of an**

adjacent building is being ignored by the applicant's architects. Flues shielded by or too close to walls and below the ridge line are unsafe for those using the combustion devices. That is why it is normal for chimneys to terminate above the ridgeline, not below it or next to a wall. In the current design, the flue openings are significantly closer to the new structure than this required distance. I refer to the previously submitted image from my objection letter:

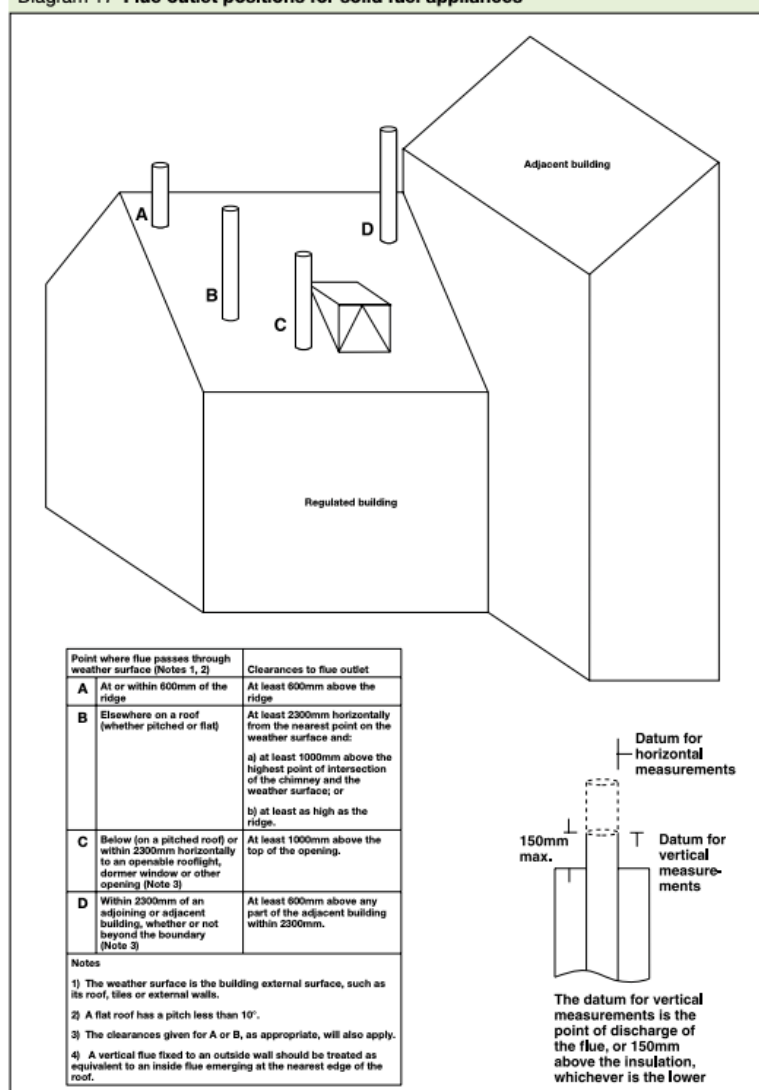


To comply with the regulations, the chimneys must be extended upwards to be 600mm above the ridge, or the proposed rooftop extension's eastern flank wall must be set back significantly from the flues. It is crucial that no part of the new structure is within 2.3 metres horizontally of the flue openings. In addition, there are multiple flue openings across the roof structure, not just the eastern flank that fail this safety regulation. These flues will need to be made taller to be compliant, and this has not yet been addressed. As you can appreciate, making the chimney design safe and compliant will have a major visual and spatial impact and must be addressed before determination, not through conditions.

Please urgently consult with your Building Control team to confirm if this design meets the fundamental safety requirements of Building Regulations Part J and upload their response to the public planning portal. No Building Control responses or consultation have been made public, despite our previous requests. Alternatively, please ask the applicant to explain why the modified flue openings appear non-compliant with AD Part J of the mandatory Building Regulations.

I hope you do not mind if I address the cycle store and bin store in a separate email.

Diagram 17 Flue outlet positions for solid fuel appliances



[Extract from Building Regulations AD Part J Diagram 17]

Many thanks,
Will