

Dear Eunice,

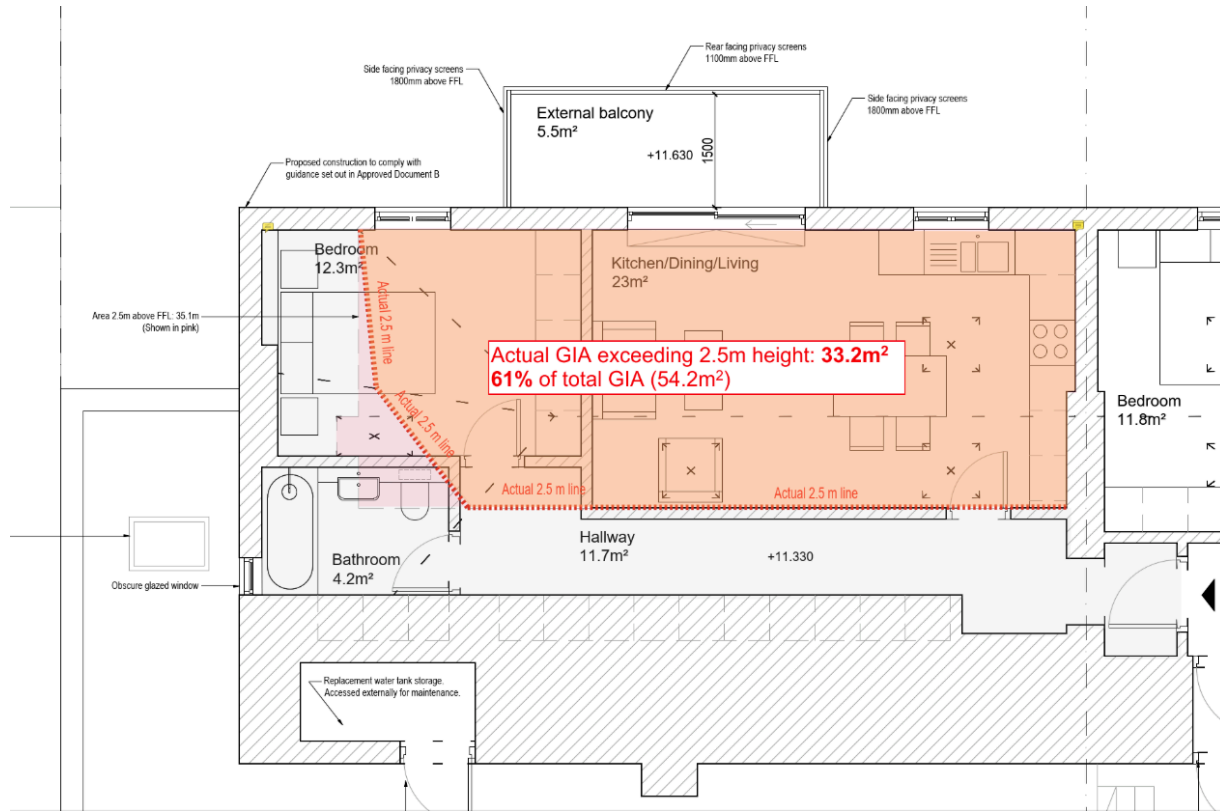
RE: Objection to Planning Application HGY/2024/0921 - Unacceptable Quality of Accommodation

I am writing to formally object to the latest revisions of the above application. Following a review of the proposed plans for **Flat 9**, it is evident that the proposal fails to meet the minimum quality standards required by the London Plan and Haringey's Local Plan. Furthermore, the drawings contain fundamental design errors that render the unit functionally unusable.

My specific concerns regarding the quality of accommodation in Flat 9 are as follows:

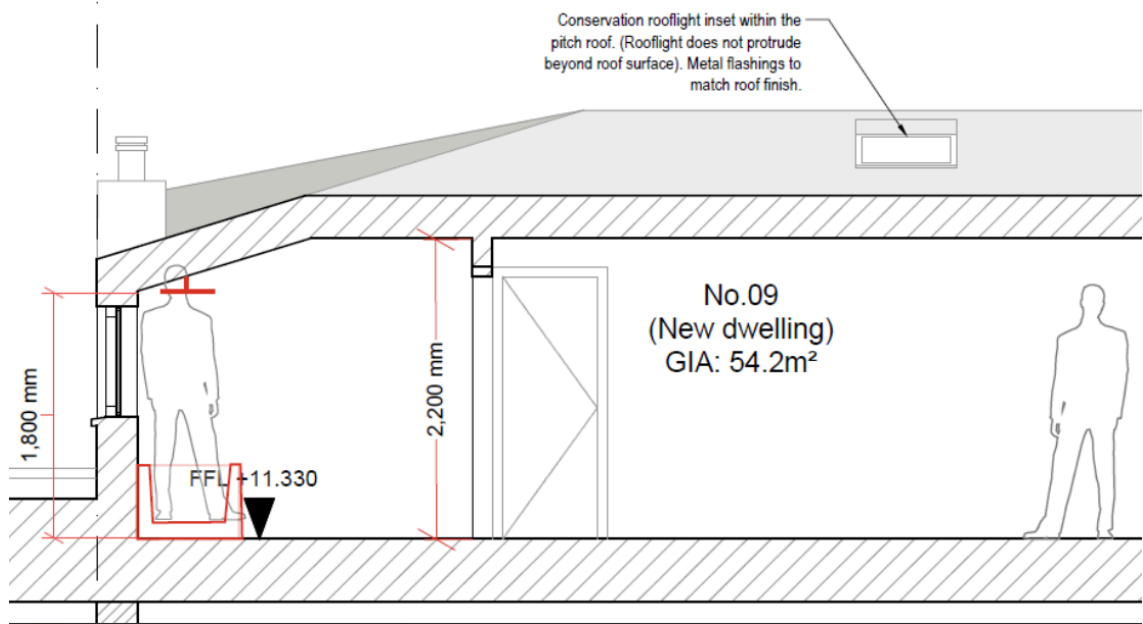
1. Non-Compliant Ceiling Heights (Breach of London Plan Policy D6): According to the applicant's revised 'L3' and roof plans, Flat 9 fails to meet the minimum ceiling height requirements mandated by London Plan Policy D6. The policy requires that at least 75% of the Gross Internal Area (GIA) must have a floor-to-ceiling height of 2.5m.

The shaded area of ceiling height exceeding 2.5m indicated on the applicant's plans is incorrect; it is geometrically impossible for the shaded area to remain orthogonal at the points where it intersects with the roof fold lines. The marked-up floor plan below illustrates the corrected shaded area, which shows the area with a ceiling height exceeding 2.5m is actually ~33m². This constitutes only 61% of the flat's GIA, falling substantially short of the 75% minimum requirement set out in Haringey's adopted policies and the London Plan:

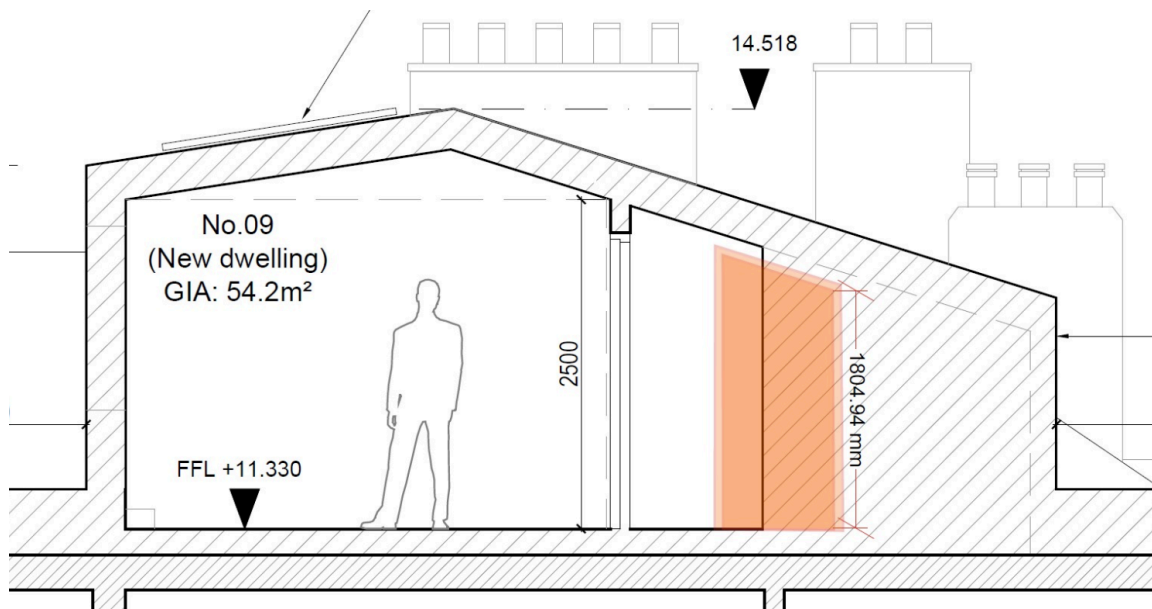


2. Unusable Amenities due to Restricted Headroom: The cross-sections provided demonstrate that the reduced ceiling heights render essential facilities potentially unusable:

- Shower:** The shower/bath is positioned under the sloping roof eaves. According to the proposed section, it appears there is insufficient standing height for a shower user. This effectively means that as proposed, the flat may not have a functional shower, falling below acceptable living standards.



- Un-openable Front & Other Doors:** The proposed reduced height entrance door to Flat 9 clashes with the sloping roof soffit. The door is physically unopenable as drawn because the head of the door leaf conflicts with the angled ceiling immediately inside the entrance.



3. Single-Aspect North-Facing Units: The proposal creates a single-aspect, North-facing unit. New build single aspect units are not allowed by London Plan Policy D6, which states that

single-aspect dwellings should be avoided and must not face North due to the lack of direct sunlight, poor daylighting, and difficulties with passive ventilation.

4. Omission of Mandatory Sprinkler Plant: According to the applicant's Fire Statement Form, a Category 2 Automatic Water Fire Suppression System (AWFSS) is required for each new flat and will be provided. This mandatory system necessitates a shared or individual water tank (approximately 3,000–4,500 litres in capacity) along with associated pumps, inspection spaces etc. as mandated by the BS 9251:2021 for a Category 2 system design. This typically requires a dedicated plant area of 3-4m² as minimum. Crucially, the proposed plans do not demonstrate any viability of such a system: no space is allocated in the communal or individual flats for this mandatory tank. This installation will inevitably reduce the usable GIA, thereby further diminishing the already unacceptable quality of the new build accommodation.

We remind the council that the already limited flat GIAs will also need to accommodate mechanical ventilation systems, EAHPs and power storage banks with power inverters from the north facing PVs. It is essential that the Council satisfies themselves and the public that the proposals, especially those concerning life safety systems are viable.

5. Non-compliance with Part M4(2) Accessibility Standards The applicant has omitted any required demonstration of compliance with the standard from their Design and Access Statement yet incorrectly confirmed compliance with Building Regulations AD Part M4(2) on their application form and Fire Statement Form. London Plan Policy D7 and Haringey Local Plan SP2 require that 90% of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

While Policy D7 allows for some flexibility in exceptional circumstances (such as small-scale infill developments), this exemption is explicitly limited to "blocks of four storeys or less". As this proposal will result in a building of five storeys, the exemption does not apply, and full compliance is necessary.

The submitted plans demonstrably fail to meet these standards:

- **Lack of Level Access:** There is no level access to the private outdoor spaces (terraces/balconies) as required by Part M4(2).
- **Insufficient Clearances:** The landing for the principal private entrance lacks the required 1.2m x 1.2m clearance, and necessary 300mm door nibs are missing.
- **No Lift Access:** The new units are on the fifth storey (4th floor) and are only accessible via 7-8 flights of stairs, contravening the requirement for step-free access to the dwelling.

Therefore, the proposal fails to meet the minimum acceptable inclusive design standards required by the adopted regional and local policies.

6. Unsafe and Unusable Roof Access: Most worryingly, the proposed access staircase in the revised 'L3' "DRAFT" plan (CF-214-DR-1130-D) to the roof adjacent to Flat 9's front door is unsafe for access and maintenance use. It is clear there will be frequent and necessary maintenance access needed at least for regular PV cleaning, fixed window and rooflight cleaning, indicated relocated water tank, potential sprinkler tanks, existing fireplace chimney sweeping and maintenance. Yet the access arrangement supplied is either missing or completely inadequate and unsafe:

- **Unsafe Headroom:** The revised plan would suggest a ceiling height of approximately **1.6-1.7m** for the access staircase. This is dangerously low and falls well below the minimum headroom requirements for safe access. To clarify this issue, please request a section through this access stair from the applicant.
- **Non-compliant Steps:** Two steps are proposed between the internal landing (+11.330) and the external roof level (+10.921). This means each step will have an unacceptably tall rise height of 205mm, against Building Regulations AD Part K and British Standards.
- **Unopenable Doors:** The proposed access hatch doors are shown opening directly into the roof pitch/soffit. This physical clash makes the doors impossible to open as drawn. Consequently, there is no safe or functional access provided for the necessary maintenance of the roof, proposed PV panels and existing active chimneys. Please request a section through this access stairs from the applicant to confirm viability of this.

Conclusion The proposed Flat 9 is a contrived design that attempts to squeeze accommodation into a roof space that cannot support it as designed. It fails minimum quantitative policy standards (ceiling height), fails qualitative standards (North-facing single aspect), and fails basic functional checks (unopenable front door and potentially unusable showers). The design completely omits necessary space allocation for Category 2 AWFSS as necessitated by the applicants themselves. The proposed design grossly fails to provide any acceptable safe-access for regular maintenance and cleaning.

We urge you to reject this application on the grounds of substandard and unacceptable accommodation quality and poor and incomplete design.

Many thanks,

Will Chan