

Mr Gareth Prosser
Deputy Team Leader (East Team)
Placemaking and Housing
Haringey Council
Level 5 Alexandra House
10 Station Road
London
N22 8ZW

Date: 25 September 2024
Our ref: 65403/01/MS/PN/32851707v1

Dear Gareth

Edmansons Close, Bruce Grove Haringey – Revised application documentation (Application Refs: HGY/2022/4319 and HGY/2022/4320)

Further to recent and on-going discussions on the proposed development at Edmansons Close, I write to enclose an updated documentation pack, which fully addresses all the final outstanding matters on energy/ sustainability, transport and heritage in line with our conversations and the discussions with your Officers.

Since the applications for full planning and listed building consent were submitted back in September 2022, there have been a number of queries going back and forth between the Council and the Applicant. We set out our approach by email on 25/07/2024 to seek agreement from LB Haringey on the final outstanding matters and our approach to address these. LB Haringey confirmed that the proposed approach reflects its understanding of the discussions to date by email dated 15/08/2024.

This approach is set out below again simply for ease of reference.

Topic	LBH comments	Applicant comments	Applicant's approach
Sustainability	- Add additional PVs. - If ASHPs cannot be provided to all units, a site-wide heat network should be considered and if this is not possible the	Site-wide heating system is not appropriate for this development (additional infrastructure costs, management costs, higher heat losses and	New build elements <u>Solar PV panels</u> to be added to the corner pavilions and additional PV panels on the roof of the apartment block. This will provide 47 panels (increased from 20), minimum assumed output

	rationale should be provided. • All electric approach and no gas. • Energy Assessment must follow the standard procedure and use notional figures for existing building as per the Energy Assessment Guidance 2022 and Approved Document L.	overall costs to residents etc). ASHPs can be installed across all properties other than the 8 x 1 bed units. This is because these units are already very small (44.6 sqm across ground and first floor). A previous issue on this scheme has been the limited amount of storage available in the 1 bed units. One of the few storage spaces is under the stairs. If an ASHP was to be installed in the dwelling, this space would be where the hot water cylinder would be located. This would take away the storage space. This space is where the electric boiler would also need to be included, but the dimensions are considerably smaller than that of a cylinder, and so still allow some storage space also. As these dwellings are small, and do not have baths, these boilers can provide the hot water to all taps and showers within the dwelling without the need for a hot water cylinder. An example of an electric boiler that could be used is a Daxim wall hung boiler, with dimensions of around 70cm x 40cm. While the utility costs for electric boilers are	increased to 350 W per panel. Overall this increases the site wide PV allocation from 5 kWp to 16 kWp (energy calculations to be updated to show CO₂ reduction). Existing dwellings (almshouses) • <u>Floor and wall insulation</u> to be included. Full detail and U-value calculation to be concluded, but proposed approach is to add natural, breathable insulation between timber joists, with suitable air tightness membrane above and breathable membrane over the joists to minimise condensation risk. A suitable, well-ventilated void also needs to be maintained beneath the floor. • Other fabric efficiency measures will be incorporated such as an insulated plasterboard as internal wall insulation on the external walls of dwellings; insulation to minimise thermal bridging risks around window and door openings; minimisation of condensation risk during detailed design; roofs will be well insulated with
--	---	---	--

		higher compared to gas, the dwellings are small and will have relatively low heat demands and electric boilers remove the need for annual maintenance costs and a gas standing charge. The boilers will only be required for 8 dwellings. The other option of running a site wide heat network is likely to increase the running costs to all dwellings on site and cannot be provided given the heritage and site constraints. • Energy Assessment will be updated accordingly – see further detail in next column under Applicant's approach.	approximately 400mm mineral wool insulation; secondary glazing will be added behind existing single glazed windows; and new windows and doors to the rear elevations as part of the refurbishment will be double glazed units. • <u>Heating - Individual ASHPs</u> to be installed to all dwellings (new and existing) apart from the 1 bed almshouses. 8 x 1 bed almshouses to have electric combi boilers (no hot water cylinder required). No gas in the new scheme. <u>Overheating (new and existing elements)</u> • Modelling and strategies to be updated, including the following: • Existing dwellings assessed and the strategies will be detailed • Louvered sliding screens to be added to the south facing facade of the apartment block, subject to approval from the Planning and Conservation officers. Louvres will be painted in the same heritage colour
--	--	--	--

			as the windows and doors. • Overall strategy to be reviewed with louvres included. • DYS2 and DSY3 results clearly presented • More detailed retrofit strategy provided. • The agreement reached with your sustainability officer and the rationale behind it will be presented in a single updated report from our specialist.
Heritage	• Missing elevations and plans for the bin store and cycle store. • East and West elevations for the pavilions do not match the floor plans – the windows to the stairwell are inconsistent • PV panels and ASHPs are not included in the proposed sections or plans - unclear if these (and any associated screening) will sit beneath the parapet for the flat blocks. • Full condition survey required	• In relation to elevations and sections, plans have been fully updated to positively respond to the comments received. • A full condition survey has been submitted and reviewed by LBH conservation officers who have accepted the findings of the report. • An approach with officers has been agreed in relation to the rear elevations which includes: • Changes to rear	• Updated plans will form part of revised submission when submitted as a whole pack in line with our comments in the adjacent column to the left. • The DAS will also be updated to capture all the agreed changes.

	- Concern over the proposed external alterations to the Almshouses (aside from the extensions to 6 units which are acceptable). - Amending the proposals to cause less harm would not need to affect the scheme in a significant way – the new build elements would be the same, as well as the mix, number and form of the units inside the almshouses and the standard of accommodation they would provide, particularly on the ‘double width’ units to blocks 2, 3 and 4. They could keep the existing openings of the building to at least one half of the new unit without it affecting the schemes benefits or viability.	elevations of House Types 1, 2 and 3. This will affect blocks 1,2,3,4, and 5. House Type 1 change: Retain existing rear elevations and change door to fully glazed. House Types 2 and 3 change: Retain half the existing rear elevation and change door to fully glazed (as house type 1). Add double glazed doors to the other half (to living room side) to replace sash window and single door.	
Transport	Car free development sought, other than provision for disabled spaces (5 in total).	Applicant agrees and has had previous discussions with LBH regarding options for proposed spaces. It's understood the latest plan sent to LBH on 12th July is accepted by the	Updated layout plan to be submitted showing the revised car parking layout. As discussed and agreed, we will show planting (shrubs and hedges) around the spaces to minimise their visual impact.

		Council. This includes one disabled space to each of the four corners of the Green, the fifth space being located to the bottom south corner of the green.	
--	--	--	--

In summary, the key proposed changes include:

- **Additional Solar PVs have been added to the apartment building and corner pavilions** –these are illustrated on the revised drawings and referenced accordingly in the updated reports where applicable.
- **Private car parking has been removed to provide only five disabled car parking spaces, including an updated layout plan** – This is set out within the updated Transport Statement Note (V2). An updated landscaping plan is also included within the Design and Access Statement (DAS) to indicate proposed screening to the disabled car parking spaces.
- **Floor and wall insulation has been added to existing almshouses** – this is shown on the revised drawings and referenced in the updated reports.
- **Other fabric efficiency measures have been incorporated** – these are shown on the updated drawings and referenced in the updated reports.
- **ASHPs have been added to all almshouses except the 8 x 1 bed almshouses** – these are shown on drawings and referenced in the updated reports. Reference is made within the Energy/ Sustainability and Overheating reports. Reference is also made to the electric combi boilers to the 8 x 1 bed almshouses.
- **Overheating Strategy** – this has been revised to update modelling and strategies as requested.
- **Changes to rear elevations of almshouses as requested have been made**– these are detailed within the DAS and updated drawings, with updated assessment in the Heritage Statement.

Revised description of development

On the basis of the above changes, as there are no changes to unit numbers, we confirm that the description of development should remain mostly the same, with a change only to reflect the removal of ‘car parking’ and replace this with ‘provision of five disabled car parking spaces.’

The revised description of development is therefore suggested as,

“Demolition of existing laundry building and 1970s infill building; alterations and extensions to 44 existing almshouses to create 8 x 1 bed, 12 x 2 bed and 6 x 3 bed units; alterations to existing

Gatehouse to provide 1 x 2 bed unit; construction of 1 x new build 3 bed almshouse to replace 1970s infill building; construction of a new apartment building comprising 7 x studio units and 9 x 1 bed units; construction of 4 x new build 2 bed units within two new pavilions (2 units in each pavilion, 4 units in total); with landscaping; improvements to access; provision of five disabled car parking spaces; and ancillary development thereto.”

The revised documentation includes the following:

Previous document (to be superseded)	Updated
Design and Access Statement – September 2022	Design and Access Statement - September 2024
Heritage Statement – February 2024	Heritage Statement – September 2024
Sustainability Statement - September 2022	Sustainability Statement - September 2024
Dynamic Overheating Report - August 2022	Dynamic Overheating Report - September 2024
Energy Statement - September 2022	Energy Statement - September 2024
Drawings – September 2022	Drawings - Please see drawing list September 2024 which includes 2 columns clearly setting out original drawing numbers as per the Sept 2022 application submission and new drawing numbers, where these have been updated and are replacing previous versions.
N/A	New Transport Statement Note (V2) to form an addendum to the Transport Statement September 2022.

Having reached agreement on all the design aspects of the scheme, a new cost plan has been prepared to reflect the final design and the applicant is currently updating the financing modelling. We would welcome the opportunity to present the results of the financial modelling to you and Robbie Erbmman with a view to discussing the implications around viability, grant funding and affordable housing provision, so we can agree the approach on this final planning issue. Is there an opportunity to discuss this next week?

In the meantime, we'd be grateful if you can share the updated information with the relevant consultees and confirm that you are happy with the proposed changes. Please do contact me if you need to discuss anything and I look forward to hearing from you soon.

Yours sincerely



Pippa Nisbet
Planning Director
BA (Hons) DipTP MRTPI