

## NOTICE OF MEETING

# PLANNING SUB COMMITTEE

**Thursday, 5th February, 2026, 7.00 pm - George Meehan House, 294 High Road, Wood Green, London, N22 8JZ (watch the live meeting [here](#), watch the recording [here](#))**

**Councillors:** Sean O'Donovan, Lotte Collett, Barbara Blake (Chair), Reg Rice, Nicola Bartlett, John Bevan (Vice-Chair), Cathy Brennan, Scott Emery, Emine Ibrahim, Alexandra Worrell and Kaushika Amin

**Quorum:** 3

### 1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

### 2. PLANNING PROTOCOL

The Planning Committee abides by the Council's Planning Protocol 2025. A factsheet covering some of the key points within the protocol as well as some of the context for Haringey's planning process is provided alongside the agenda pack available to the public at each meeting as well as on the Haringey Planning Committee webpage.

The planning system manages the use and development of land and buildings. The overall aim of the system is to ensure a balance between enabling development to take place and conserving and protecting the environment and local amenities. Planning can also help tackle climate change and overall seeks to create better public places for people to live, work and play. It is important that the public understand that the committee

makes planning decisions in this context. These decisions are rarely simple and often involve balancing competing priorities. Councillors and officers have a duty to ensure that the public are consulted, involved and where possible, understand the decisions being made.

Neither the number of objectors or supporters nor the extent of their opposition or support are of themselves material planning considerations.

The Planning Committee is held as a meeting in public and not a public meeting. The right to speak from the floor is agreed beforehand in consultation with officers and the Chair. Any interruptions from the public may mean that the Chamber needs to be cleared.

### **3. APOLOGIES**

To receive any apologies for absence.

### **4. URGENT BUSINESS**

The Chair will consider the admission of any late items of urgent business. Late items will be considered under the agenda item where they appear. New items will be dealt with at item 10 below.

### **5. DECLARATIONS OF INTEREST**

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

### **6. MINUTES (PAGES 1 - 4)**

To confirm and sign the minutes of the Planning Sub Committee held on 12<sup>th</sup> January as a correct record.

### **7. HGY/2025/3217 MALLARD PLACE, COBURG ROAD, WOOD GREEN N22 6TS (PAGES 5 - 280)**

**Proposals:** Full Planning Application for the demolition of existing buildings to deliver a new development comprising 150 new council homes (Use Class C3) and flexible workspace (Use Class E), erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing; alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.

**8. HGY/2025/0930 BEROL QUARTER, ASHLEY ROAD, TOTTENHAM HALE, LONDON, N17 9LJ (PAGES 281 - 856)**

**Proposal:** Application made under Section 73 of the Town and Country Planning Act 1990 to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted 03/03/2025.

Permission is sought to alter the permitted level of affordable housing to change 60 intermediate affordable homes to market sale. Permission is also sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels (shifting the openings to the centre of the room).

**9. UPDATE ON MAJOR PROPOSALS (PAGES 857 - 868)**

To advise of major proposals in the pipeline including those awaiting the issue of the decision notice following a committee resolution and subsequent signature of the section 106 agreement; applications submitted and awaiting determination; and proposals being discussed at the pre-application stage.

**10. NEW ITEMS OF URGENT BUSINESS**

**11. DATE OF NEXT MEETING**

To note the date of the next meeting as 5<sup>th</sup> March.

Kodi Sprott, Principal Committee Coordinator  
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Fiona Alderman  
Director of Legal & Governance (Monitoring Officer)  
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Wednesday, 28 January 2026

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**1. FILMING AT MEETINGS.**

The Chair referred to the notice of filming at meetings and this information was noted.

**2. PLANNING PROTOCOL**

The Chair referred to the planning protocol and this information was noted.

**3. APOLOGIES**

Apologies for absence were received from Cllr Worrell, Cllr Ibrahim and Cllr Emery.

**4. Urgent business**

There were no items of urgent business.

**5. DECLARATIONS OF INTEREST**

Cllr Collet declared an interest in relation to the pre application briefing as she lived in the ward of Coburg but would view the item with an open mind.

**6. Minutes**

The minutes of the meeting held on 8<sup>th</sup> December were approved.

**RESOLVED****7. PRE-APPLICATION BRIEFINGS - PPA/2025/0002; HGY/2025/3217  
MALLARD PLACE, COBURG ROAD, WOOD GREEN N22 6TS (PAGES 7 -  
46)**

Valerie Okeiyi, Principal Planning Officer, opened the item for the item for redevelopment of the site with the erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing, to provide 150 social rent dwellings along with double height flexible workspace (539 sqm). The proposal also includes landscaped public realm. The applicant presented their proposed scheme to the committee.

The following was noted in response to questions from the committee:

- Every flat would have a balcony or a terrace, including these on the ground floor.
- Members noted the design and usage of white bricks.
- The applicant stated that the offer of the workspace had not changed it would always be flexible, and affordable where possible. The chocolate factory phase 1 workspace was vacant and it was challenging to occupy the unit. The applicant wanted to ensure that there was the greatest flexibility for the use of the space, to ensure it is occupied, and to enliven the street frontage.
- The applicant considered that the colours of the bricks were much richer in reality (than the visuals presented) and there was a much greater depth to the facade. There would be bricks used that developers had used many times before on different projects. The applicant sought a warm toned brick and

there were two colours. They considered it to be a high quality design and stated that they had worked hard on the elevations and window proportions to deal with issues of daylight and overheating. There would be integrated roller blinds into all of the windows.

- The applicant stated that they had tried to make the elevation appear as slim and elegant as possible.
- The QRP had offered another session which would be focused on the elevations; but Officers agreed that the applicant had sufficiently addressed QRP comments.
- There would be 10% wheelchair homes in the development.
- Only one proposed home would be single aspect.
- The homes that would be two bed and below were all to have open plan kitchen diners, and then the three and four beds would generally have separate kitchen diners.
- In terms of the overall colour palette, the applicant considered it reflected adjacent historic buildings using a green brick and green metal work. The Chocolate Factory was quite a big influence on the design as a sizeable white rendered building in the local area, but the usage of bricks was proposed to promote longevity.
- The QRP panel talked about having the Penstock Tunnel painted and renovated. Members wondered if one of the commercial units could be given free to an artist to complete renovations and also that use of a workspace to provide playspace to serve the development might be possible.
- The committee would like to put Haringey on the map in terms of the quality of design of properties that are being built.

### **8. UPDATE ON MAJOR PROPOSALS (PAGES 47 - 58)**

To advise of major proposals in the pipeline including those awaiting the issue of the decision notice following a committee resolution and subsequent signature of the section 106 agreement; applications submitted and awaiting determination; and proposals being discussed at the pre-application stage.

There were no questions on this item.

### **9. APPLICATIONS DETERMINED UNDER DELEGATED POWERS (PAGES 59 - 106)**

To advise the Planning Committee of decisions on planning applications taken under delegated powers for the period 01.11.2025 – 31.12.2025.

There were no questions on the item.

**10. NEW ITEMS OF URGENT BUSINESS**

There were none.

**11. DATES OF FUTURE MEETINGS**

5<sup>TH</sup> February 2026.

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Planning Sub Committee

Item No.

**REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE****1. APPLICATION DETAILS****Reference Nos:** HGY/2025/3217**Ward:** Noel Park**Address:** Mallard Place, Coburg Road, Wood Green N22 6TS**Proposals**

Full Planning Application for the demolition of existing buildings to deliver a new development comprising 150 new council homes (Use Class C3) and flexible workspace (Use Class E), erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing; alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.

**Applicant:** London Borough of Haringey**Agent:** Sophie Heritage, Icen Projects**Ownership:** Private**Case Officer Contact:** Valerie Okeiyi

1.1 This application has been referred to the Planning Sub Committee for a decision as it is a major application that is on Council land.

**1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION**

- The proposed scheme follows a design-led approach that capitalises on the site's highly accessible location to deliver 100% social rent homes, making a significant contribution to the Borough's affordable housing targets while supporting the creation of a mixed and balanced community. The proposal accords with the objectives of both local and strategic planning policies aimed at maximising the delivery of genuinely affordable housing in accessible locations.
- The proposal would redevelop a brownfield site, with a high-quality, mixed-use, development which responds appropriately to the local context and within a designated growth area with good access to public transport and existing neighbourhood facilities, where higher density development is encouraged and would meet the requirements of Site Allocation SA19 'Wood Green Cultural Quarter (South)' of the Site Allocation Development Plan Document 2017.

- The development would provide 539sqm of commercial floorspace (of flexible uses) secured as affordable workspace. This would potentially generate 28 jobs, a substantial uplift on existing.
- The development would provide 150 new homes, contributing towards much needed housing stock in the borough.
- The size, mix, and quality of homes is acceptable, and the homes would either meet or exceed relevant planning policy standards. All flats would have private external amenity space.
- The proposed development will lead to a very low, less than substantial, harm to the significance of the conservation area and its assets that is outweighed by the several significant public benefits of the development.
- There would be no significant adverse impacts on the surrounding highway network or on car parking conditions in the area.
- The development would achieve a reduction of 66% carbon dioxide emissions over Building Regulations Part L 2021 and provide appropriate carbon reduction measures, plus provide a carbon off-setting payment, as well as site drainage and Biodiversity Net Gain (BNG) of 100%; which is significantly in excess of the mandatory 10% net gain required by policy.
- The proposed development would secure several obligations, including financial contributions to mitigate the residual impacts of the development.

## 2. RECOMMENDATION

- 2.1 That the Committee authorise the Head of Development Management or the Director of Planning and Building Standards to **GRANT planning permission** subject to the conditions and informatives set out below and the completion of an agreement satisfactory to the Head of Development Management or the Director of Planning and Building Standards that secures the obligations set out in the Heads of Terms below, and subject to referral to the Mayor of London and any direction they make.
- 2.2 That delegated authority be granted to the Head of Development Management or the Director of Planning and Building Standards to make any alterations, additions or deletions to the recommended measures and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice-Chair) of the Sub-Committee.
- 2.3 That the agreement referred to in resolution (2.1) above is to be completed no later than 28 April 2026 within such extended time as the Head of Development Management or the Director of Planning & Building Standards shall in their sole discretion allow; and
- 2.4 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be

granted in accordance with the Planning Application subject to the attachment of the conditions.

- 2.5 Planning obligations are usually secured through a S106 legal agreement. In this instance the Council is the landowner of the site and is also the local planning authority.
- 2.6 There would be a Director's agreement signed between the parties (applicant as the Housing Department and Planning & Building Standards as the Local Planning Authority) to secure obligations that would otherwise ordinarily be set out in a S106 document.
- 2.7 It is recognised that the Council cannot enforce against itself in respect of breaches of planning conditions, and so prior to issuing any planning permission measures would be agreed between the Council's Housing service and the Planning service, including management for the resolution of non-compliance with planning conditions by the Chief Executive and the reporting of breaches to portfolio holders, to ensure compliance with any conditions imposed on the planning permission for the proposed development.
- 2.8 The Council cannot impose conditions on a planning permission requiring the payment of monies and so the Director of Delivery has confirmed in writing that the payment of contributions for the matters set out below would be made before the proposed development is implemented.
- 2.9 A summary of the planning obligations Heads of Terms for the development is provided below:

- 1. Affordable Homes**

All of the homes to be secured as Social Rent properties

- 2. Carbon/Climate Change**

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £130,987 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO<sup>2</sup> at the Energy Plan and Sustainability stages
- A single point Future DEN connection (and associated obligations)

- 3. Car-Capped Agreement**, including a £4,000 contribution to amend the Traffic Management Order

#### **4. Car parking Management Plan**

- Accessible on street parking bays for Blue Badge Holders
- EV charging points for accessible parking bays

#### **5. Construction Demolition Plan**

£15,000 towards monitoring of the Construction Logistics and Management Plan,

#### **6. Site wide Travel Plan**

Monitoring of commercial travel plan and Residential Travel Plan contribution of £15,000 per year

#### **7. Pedestrian wayfinding to/from the site**

£50,000 towards the development and installation of wayfinding signage

#### **8. Active Travel Zone Assessment**

Enhance a short section of segregated cycle lane on the southern side of Mayes Road to consist of the following works:

- £120,000 towards the implementation of the new cycle route;
- To enhance cyclist/pedestrian safety, at the 4-arm signalised junction of Station Road, A105 High Road, A109 Lordship Lane through the following measures;
  - Provide dedicated cycle signals with an early-release phase to improve cyclist visibility and reduce conflicts with turning traffic.
  - £40,000 towards the design and development of the improvement scheme - Tighten the Station Road turning radii to slow vehicle speeds and enhance safety for all users.

#### **9. Highways works**

Footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements.

#### **10. Child playspace**

- £131,765 towards off-site provision, including the creation of new children play space or improvements to existing provision in the locality
- Provision of child playspace within the development

### **11. Reprovision of Area 51 Education**

Measures to prevent the redevelopment of the site taking place until suitable alternative accommodation has been secured by the Council.

### **12. Street Trees**

- £136,270 towards planting of new standard sized trees within a 500 metre radius of the site to mitigate the CAVAT loss of the mature London Plane Trees proposed for removal (The type and number of standard trees to be agreed with the arboricultural officer)

### **13. Affordable Workspace**

Affordable workspace with flexible uses in commercial space at ground and first floor

### **14. Employment and Skills Plan**

### **15. Obligations Monitoring Fee**

**Conditions/Informative Summary** – (the full text of recommended conditions/informative is contained in Appendix 2 of the report.)

#### **Conditions**

1. Time Limit (Compliance)
2. Approved plans and documents (Compliance)
3. Materials and detailing (Prior to commencement)
4. Boundary Treatment and access control (Pre-occupation)
5. Landscaping (Prior to commencement of relevant part)
6. Play equipment
7. Biodiversity Net Gain Plan (Pre-occupation)
8. BNG Monitoring (Pre-occupation)
9. Lighting (Pre-occupation)
10. Noise from building services plant and vents (Compliance)
11. Secure by Design Accreditation (Pre-above ground works)
12. Secure by Design Certification (Pre-occupation)
13. Flood & Water Lead - Surface Water Drainage (Pre-commencement)
14. Flood & Water Lead - SuDS management and Maintenance Strategy (Pre-occupation)
15. Thames Water - Piling Method Statement (Pre-commencement)
16. Crossrail 2 - Detailed Design and Method Statement
17. Land Contamination (Pre-commencement)

18. Unexpected contamination (if identified)
19. NRMM (Pre-commencement)
20. Management and Control of Dust (Pre-commencement)
21. Delivery and Servicing Management Plan (Pre-occupation)
22. Considerate Constructors (Compliance)
23. Energy Strategy (Pre-above ground works)
24. Sustainability Review
25. Be Seen
26. Overheating (Pre-above ground works)
27. Building use guide
28. Sustainability Standards for non-residential units
29. Living Roofs (Pre-above ground works)
30. Climate Change adaption
31. Circular Economy (Pre-Construction report, Post Completion report)
32. Whole Life Carbon
33. Urban Green Factor (Compliance)
34. Arboricultural Method Statement (Compliance)
35. Cycle Parking (Pre-occupation) – *ref the external short stay storage*
36. Accessible Parking Bay(s) (Pre-commencement)
37. Waste/Recycling Storage (Prior to commencement of relevant part)
38. Restriction to Telecommunications Apparatus (Restriction)
39. Building Regulations Part M (Compliance)
40. Communal antennae
41. Commercial Units – Hours of operation
42. Commercial Shopfront
43. Restriction to Use Class
44. Architect Retention
45. Air Quality Neutral
46. Internal Playspace

### **Informatives**

- 1) Positive and Proactive
- 2) Directors Agreement Letter
- 3) CIL
- 4) Land Ownership
- 5) Party Wall Act
- 6) Hours of Construction
- 7) Street Numbering/Naming
- 8) Asbestos
- 9) Metropolitan Police Service Designing Out Crime
- 10) Crossrail 2
- 11) Thames Water
- 12) Thames Water

13) Water Consumption

- 2.10 In the event that members choose to make a decision contrary to officers' recommendations members will need to state their reasons.
- 2.11 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.3) above, the planning permission be refused for the following reasons:
1. The proposed development, in the absence of a legal agreement would fail to secure the provision of on-site affordable housing and meet the housing aspirations of Haringey's residents. As such, the proposals would be contrary to Policies H4 and H5 of the London Plan 2021, Policy SP2 of the Local Plan 2017 and Policies DM11 and DM13 of the Development Management Development Plan Document 2017
  2. 1) The proposed development in the absence of a legal agreement to pay a contribution to 1) necessary highway works; 2) Implementation of a Car Parking Management Plan; 3) A contribution to monitor the Demolition and Construction Plan; 4) A contribution towards a pedestrian wayfinding to/from the site; 5) A contribution towards Active Travel Zone Assessment and 6) Implementation of a commercial and residential travel plan and monitoring fee; would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal is contrary to Policy T1 of the London Plan 2021 and Policies DM31, DM32 and DM48 of the Development Management Development Plan Document 2017.
  3. In the absence of a legal agreement securing a contribution towards off site child playspace provision and ~~off-site~~ provision of children's playspace at, would result in an unacceptable shortfall in playspace to meet the needs of future residents. As such, the proposal is contrary paragraph 9.20 of the Planning Obligations SPD (2018)
  4. The proposed development, in the absence of a legal agreement securing sufficient energy efficiency measures and a financial contribution towards carbon offsetting, would result in an unacceptable level of carbon dioxide emissions. As such, the proposal would be contrary to Policies SI 2 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

5. The proposed development, in the absence of a legal agreement to work with the Council's Employment and Skills team and to provide other employment initiatives, would fail to support local employment, regeneration and address local unemployment by facilitating training opportunities for the local population. As such, the proposal is contrary to Policy SP9 of the Local Plan 2017.
6. The proposed development, in the absence of a legal agreement securing the re-provision of Area 51 Education, would result in the unacceptable loss of social infrastructure without adequate mitigation. As such, the proposal is contrary to Policy DM49 of the Development Management Development Plan Document 2017.

2.8 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:

- (i) There has not been any material change in circumstances in the relevant planning considerations, and
- (ii) The further application for planning permission is submitted to and approved by the Director within a period of not more than 12 months from the date of the said refusal, and
- (iii) The relevant parties shall have previously entered into the agreement contemplated in resolution (1) above to secure the obligations specified therein.

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4. CONSULTATION RESPONSES
5. LOCAL REPRESENTATIONS
6. MATERIAL PLANNING CONSIDERATIONS
7. COMMUNITY INFRASTRUCTURE LEVY
8. RECOMMENDATION/PLANNING CONDITIONS & INFORMATIVES

## **APPENDICES:**

Appendix 1	Planning Conditions and Informatives
Appendix 2	Plans and Images
Appendix 3	Consultation Responses - Internal and External Consultees
Appendix 4	Consultation Responses – Greater London Authority Stage 1 Response
Appendix 5	QRP Report
Appendix 6	Development Management Forum Minutes
Appendix 7	Pre-application Committee minutes

### **3.0 PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS**

#### **3.1 Proposed development**

- 3.1.1 Planning permission is sought for the demolition of the existing building which is occupied by the John Dewey (Area 51 Education) Special Needs College and the erection of a 22 storey building with an 8 storey wing, and a 14 storey building with a 6 storey wing, to facilitate a mixed-use development comprising of 150 social rent homes along with double height flexible workspace (539 square metres).
- 3.1.2 The buildings would be sited around a two-storey communal podium garden and would also provide significant public realm improvements, soft and hard landscaping, cycle parking, blue badge parking and other associated works.
- 3.1.3 The proposed development can be broken down into 5 components, as follows; the east tower, east wing, west tower, west wing and podium.
- 3.1.4 The proposed buildings range from 2 to 22 storeys in height. The eastern building is proposed as a 22-storey tower with an adjoining 8-storey wing. The western building is proposed as a 14-storey tower with an adjoining 6-storey wing. The podium which would adjoin to both the eastern and western buildings would be two storeys in height.
- 3.1.5 The development would deliver a total of 150 new homes comprising:
- 51 x 1 bed;
  - 67 x 2 bed;
  - 28 x 3 bed and
  - 4 x 4 bed homes.
- 3.1.6 The eastern building would accommodate 91 new homes, with a further 59 homes provided within the western building.
- 3.1.7 All new homes are proposed to be provided with private amenity space. The upper-floor dwellings in both buildings would benefit from south or west facing balconies, while the maisonettes located over ground, first and second floor level within the western building would be provided with private rear gardens. In addition, a series of communal podium courtyards are proposed at second, sixth and eighth floor levels, incorporating dedicated children's play space.

- 3.1.8 A total of 539 square metres of flexible Use Class E floorspace is proposed across the development at ground and first floor levels, allowing for a wide range of commercial, business and service uses. The eastern building would accommodate six commercial units and a commercial breakout area on the ground and first floor, with a further commercial unit located on the ground floor of the western building.
- 3.1.9 At ground floor level of the western building, the scheme provides four four-bedroom family maisonettes arranged across the ground, first and second floors, each individually accessed directly from New Street. The residential core entrances serving the upper-floor dwellings in both the eastern and western buildings would be accessed from New Street and Coburg Road.
- 3.1.10 The ground floors of both buildings would also accommodate separate residential and commercial refuse stores. Commercial cycle storage, three flexible commercial units, and associated plant and service rooms would be distributed across the eastern building, western building and podium building.
- 3.1.11 At first floor level, the development includes three residential units, six residential cycle stores including one accessible cycle store, four flexible commercial units, a commercial workspace breakout area, and additional service rooms distributed across the eastern building, western building and podium building.
- 3.1.12 The upper floors of both the eastern and western buildings have been designed to accommodate no more than six dwellings per floor in the wings and no more than four dwellings per floor within the towers.
- 3.1.13 The communal podium at second floor level includes dedicated play space for children aged 0–4 years. Further communal podiums are provided at roof level on the six-storey wing of the eastern building and the eight-storey wing of the western building, each incorporating play space for children aged 5–11 years. The sixth and eighth floors would also incorporate extensive green roofs. Mechanical plant and photovoltaic arrays would be located at roof level on both the eastern and western buildings.

### **Materials**

- 3.1.14 The proposed development would be contemporary in design, employing a coordinated palette of materials. The towers and their associated wings would be faced in two complementary light-toned bricks. The two-storey plinth fronting Coburg Road would be expressed through the use of green glass-reinforced concrete (GRC), while the single-storey plinths along New Street and Western Road would be finished in green glazed brick. Green-coloured metalwork is proposed throughout, including to windows, doors, external blinds, balconies and Juliet railings.

### **Soft and hard landscaping and Public Realm**

- 3.1.15 The proposal includes a comprehensive soft landscaping strategy for the podium and roof terraces, incorporating trees, a mix of ferns, shrubs and bushes, wildlife-friendly amenity planting, winter seedheads and grasses, herbaceous perennials, and areas of wildflower planting on the extensive green roofs.
- 3.1.16 Hard landscaping across the podium and roof terraces would comprise resin-bound gravel with raised metal edging, plank paving, rubber mulch play surfaces, and gravel margins to the edges of the biodiverse green roofs.
- 3.1.17 The public realm would be enhanced through the incorporation of raised planting associated with ground-floor maisonettes . Key pedestrian routes would be defined and framed by a colonnaded frontage. The residential core entrance on Coburg Road would be set back from the frontage to create informal seating opportunities. The overall building layout would maximise active frontages along Coburg Road, New Street and Western Road, contributing positively to the surrounding streetscape.

### **Access, Parking and Highways**

- 3.1.18 Proposed pedestrian access to the residential cores would be taken from New Street to the north-west, and Coburg Road to the south-east. Each residential entrance would incorporate a core lobby providing step-free access to passenger lifts and staircases. The dwellings at the lower levels are to be accessed via communal deck. The four ground-floor maisonettes would be accessed independently from the northern frontage of the site via New Street. Additional secondary pedestrian access points are proposed around the perimeter of the building.
- 3.1.19 The three ground-floor workspace units would be served by separate access arrangements. One unit would be accessed directly from Western Road, while the remaining two units accessed from Coburg Road to the south. A dedicated entrance would also be provided for all workspace users, giving access to a passenger lift and staircase serving the upper floors. The three first floor workspace units and commercial breakout area would be accessed from the dedicated workspace entrance from Coburg Road via a lift.
- 3.1.20 Access to cycle parking for residential and commercial uses would be provided separately. The primary residential cycle access would be taken from Western Road, providing direct access to the main cycle lift. A secondary residential cycle lift would also be provided to accommodate accessible and non-standard cycles; this lift would be accessible via the residential core entrances to the north-west, and via a secondary entrance on New Street. The workspace cycle store would be accessible to occupiers of all workspace units, and would be accessed from the dedicated workspace entrance on Coburg Road.
- 3.1.21 The proposed scheme would be a 'car free' development. Twelve blue badge parking bays would be located on the adjacent streets set out below;
- 5 x bays on New Street

- 2 bays in the Chocolate Factory Phase 1 Block E2 Car Park
- 4 bays on Clarendon Road
- 1 bay on Western Road

3.1.22 In terms of cycle parking for the homes, 275 long-stay cycle spaces are proposed, accommodated within seven residential cycle stores located at first floor level, one of which is accessible. A dedicated cycle lift is also proposed off Western Road, which would be accessed externally and a secondary/contingency lift is accessed from New Street. In terms of cycle parking for the commercial units, 6 cycle parking spaces are proposed, accommodated within a dedicated commercial cycle store at ground level with internal access. Visitor cycle parking is proposed on New Street.

### 3.2 Site and Surroundings

3.2.1 The site known as Mallard Place, falls within the Council's ownership and is currently occupied by a two-storey building, which is covered in a green wall and hardstanding to the rear of the building. The site has a frontage onto Coburg Road to the south, Western Road to the west, Clarendon Road to the east and New Road to the north.

3.2.2 Immediately adjoining the site to the west is Raphael House and to the east is Units 1,2,3 Kingfisher Place. The site is bounded by the Chocolate Factory Phase 1 development to the north, which received planning permission and is currently being built out under planning reference HGY/2017/3020) for a mixed use development comprising of 10,657 square metres of commercial floorspace and 230 homes, made up of 80 homes to be provided at London Affordable Rent and Social Rent levels, and 150 homes for market rent.

3.2.3 To the east of the site, on the other side of Clarendon Road, is Kingfisher Place followed by other commercial uses fronting Coburg Road. Further west of the site is the train depot and railway embankment with links to Alexandra Park and the New River via the Penstock foot tunnel which is currently being upgraded. Immediately south of the site, on the other side of Coburg Road, is the St William Alexandra Gate development which received planning permission under planning reference HGY/2017/3117 for a mixed use development and is currently being built out. The mixed use permission was for the following;

- 1714 residential units;
- 7,500sqm of Class B1 Business;
- 1,500sqm to 3,950sqm Class A1-A4; 417sqm Class D1 Day Nursery;
- up to 2,500sqm Class D2 Leisure;
- two energy centres;
- vehicular access, parking; realignment of Mary Neuner Road;
- open space (pocket park)

- and landscaping and associated infrastructure works.
- 32.5% affordable housing site-wide by habitable room (48.3% affordable rent and 51.7% shared ownership).



*Fig 1: site (outlined in red) location in context*

- 3.2.4 The site is located in an Opportunity Area, as identified in the Mayor's London Plan 2021 and is located in the Wood Green and Haringey Heartlands Growth Area as identified in the Council's Local Plan 2017.
- 3.2.5 The site is also located within the designated Local Employment Area; Regeneration Area and located adjacent to Wood Green Common Conservation Area.
- 3.2.6 The site is designated in the Council's Site Allocation Development Plan Document 2017 (SA DPD) SA19 known as 'Wood Green Cultural Quarter (South)' which seeks to enhance the Wood Green Cultural Quarter through improvements to the Chocolate Factory and the creation of high-quality urban realm and comprehensive redevelopment of the remaining sites for employment-led mixed-use development with residential. The site is also designated as WG SA10 known as 'Mallard and Kingfisher Place' of the new Regulation 18 Draft Local Plan, for which public consultation has just closed. However, at this stage, the Draft Local Plan carries very little weight.

- 3.2.7 The site has a Public Transport Accessibility Level (PTAL) rating of 4, with Wood Green Underground Station being a 9-minute walk away, and Alexandra Palace National Rail station being a 10-to-11-minute walk away. Two different bus services are accessible within 6 to 7 minutes' walk of the site. There is reference to future TFL improvements to bus services that are forthcoming, related to re-routing of bus services 91/N91 and the 232 via Western Road and Mayes Road respectively.
- 3.2.8 The site sits above the potential Wood Green Crossrail 2 route.

### **3.3 Relevant Planning and Enforcement history**

- 3.3.1 HGY/2025/3217 - An Environmental Impact Assessment (EIA) Screening Opinion issued in November 2025 confirmed that the scheme was not EIA Development.
- 3.3.2 There is no other relevant planning history connected with the application property.
- 3.3.3 Relevant and recent planning permissions in close proximity of the site include:

#### **HGY/2017/3020 – The Chocolate Factory Phase 1 development**

- 3.3.4 Partial demolition, change of use and extension of the Chocolate Factory buildings. Demolition of the remaining buildings and redevelopment to create four new build blocks ranging in height from 3 up to 18 storeys. Mixed use development comprising 10,657 sq.m (GIA) of commercial floorspace (flexible Use Classes A1, A3, B1, D1 and D2), 230 Class C3 residential units together with associated residential and commercial car parking, public realm works and access – Granted 15/02/2019.

#### **HGY/2017/3117 -The Clarendon Square development /Alexandra Gate (St Williams)**

- 3.3.5 Hybrid planning permission (part Outline, part Detailed) was approved on 19/04/2018 for the demolition of Olympia Trading Estate and Western Road buildings and structures, and a phased, residential led mixed use development comprising the construction of buildings across the site to include the following 163,300sqm GEA Use Class C3 Residential; 7,168sqm to 7,500sqm GEA Class B1 Business; 1,500sqm to 3,950sqm GEA Class A1-A5; 417sqm GEA Class D1 Day Nursery; and up to 2,500sqm GEA Class D2 Leisure; New Basement Level; Two Energy Centres; Vehicular Access, Parking; Realignment of Mary Neuner Road; Open space; Associated Infrastructure and Interim Works; Site Preparation Works.

Outline Permission for 103,150sqm Class C3 Residential; 7,500sqm Class B1 Business Use; 1,500sqm to 3,950sqm Class A1-A5; and up to 2,500sqm Class D2 Leisure Use; Buildings up to 103.90m AOD; associated cycle and car parking provision; new basement level; energy centre; new public square, public realm works and landscaping; vehicular access and new servicing arrangements; associated highway works; and facilitating works. All matters (Appearance, Landscaping, Layout, Scale and Access) are Reserved. Vehicular access into the Basement Car Park from Mary Neuner Road and Western Road are submitted in detail.

Detailed Permission for the construction of Building A1-A4, B1-B4 and C1; ranging from 2 to 15 storeys to accommodate 622 residential units; 332sqm Class B1 Business Use/Class A1-A5 Use; 417sqm Day Nursery; associated cycle and car parking provision; two basements; energy centre; public realm works and landscaping; vehicular access and new servicing arrangements; associated highway works; Realignment of Mary Neuner Road. This application is accompanied by an Environmental Impact Assessment

**HGY/2023/2357 -The Clarendon Square development /Alexandra Gate (St Williams)**

- 3.3.6 Application for approval of reserved matters relating to appearance, landscaping, layout, scale, access, pertaining to Buildings H1, H2 and H3, forming Phase 4, including the construction of residential units (Use Class C3), commercial floorspace, basement, and new landscaped public space pursuant to planning permission HGY/2017/3117 dated 19th April 2018.– Granted 31/02/2024

**HGY/2021/1392 -The Clarendon Square development /Alexandra Gate (St Williams)**

- 3.3.7 Non-material amendment following a grant of planning permission HGY/2017/3117 for amendment to the description of the development to remove reference to Building Heights within the Description of Development, specifically within the Outline element of the permission. Amendment to Condition 5 (Approved Drawings & Documents) to make reference to "SK416 Rev A" as an approved drawing, and to make reference to "Development Specification Rev C (May 2021)" as an approved document. Approval dated 4 June 2021.

**HGY/2025/1548 -The Clarendon Square development /Alexandra Gate (St Williams)**

- 3.3.8 Non-material amendment following a grant of planning permission HGY/2017/3117 to amend parameter plan SK416 Rev A – PP5 Parameter Plan 5: Maximum & Minimum Building Extents, amending the parameters of Buildings G1, G2 and J2. Approval dated 29 August 2025.

## **4. CONSULTATION RESPONSES**

### **4.1 Quality Review Panel**

4.1.1 The proposal was presented to Haringey's Quality Review Panel (QRP) on 16 July 2025. The Panel offered their 'warm support' for the scheme

4.1.2 The detailed QRP comments and the latest officer response is provided within the design section of this report.

The QRP's full written response is included under Appendix 5.

#### **Pre-application Meeting with the Greater London Authority (GLA)**

4.1.3 The proposals were presented to a meeting with GLA officers in March 2025 and October 2025. The meeting addressed key strategic issues including land use, height and massing, urban design and transport.

#### **Development Management Forum**

4.1.4 The proposals were presented to a Development Management Forum on 2 October 2025.

4.1.5 The notes from the Forum are set out in Appendix 6.

#### **Planning Committee Pre-Application Briefing**

4.1.6 The proposals were presented to the Planning Sub Committee at a Pre-application Briefing in November 2025 and as a briefing in January 2026. The minutes are attached in Appendix 7.

### **4.2 Application Consultation**

4.2.1 The following were consulted regarding the application:

(Comments are in summary - full comments from consultees are included in appendix 3)

#### **INTERNAL:**

Design Officer

Comments provided are in support of the development.

Conservation Officer

Comments provided are in support of the development.

Transportation

No objections raised, subject to conditions and legal agreement

Waste Management

No objection raised, subject to conditions.

Building Control

No comment .

Trees

No objection raised, subject to legal agreement

Nature Conservation

No comments.

Pollution Team

No objection, subject to conditions and informative.

Public Health

No objection.

Surface and flood water

No objections, subject to conditions.

Climate Change

No objections, subject to conditions and S106 obligations.

Noise Pollution

No objection

Inclusive Economy

No objection.

Policy Team

No objection.

Placemaking Team (Wood Green)

No objection.

**EXTERNAL**

Health and Safety Executive (HSE)

No objection.

Greater London Authority (GLA)

The GLA Stage 1 report dated 12 January 2026 is summarised below. Stage 1 comments can be viewed in full in Appendix 4.

Strategic issues summary:

Land use principles: The redevelopment of the site to provide affordable housing and flexible workspace within a town centre and an Opportunity Area is strongly supported in strategic planning terms. The provision of affordable workspace is welcomed. It must however be demonstrated that the application will secure replacement premises for the existing SEN education use, or else robust evidence submitted that this use is not required in the borough.

Affordable housing: The proposal is to deliver 150 affordable housing units (100% by habitable room) consisting of 100% social-rented homes. This is strongly supported, and the scheme can follow the Fast Track Route.

Urban design and heritage: Whilst the site is not identified as suitable for tall buildings the proposal is coming forward in the context of an emerging tall building cluster, and the heights are acceptable in this context. A low level of harm may be caused to the significance of Alexandra Park (Registered Park and Garden) which could be outweighed by the public benefits of the proposal.

Transport: Further information is required on Active Travel Zone (ATZ) and trip generation, and mitigation to local connectivity to align with ongoing initiatives. and

a parking design and management, travel, delivery and servicing, and construction logistics, plans should be secured by conditions.

Environment and sustainable infrastructure: Further information is required, and matters raised should be addressed prior to the Mayor's decision-making stage.

Thames Water

No objection subject to conditions

Metropolitan Police Designing out crime

No objections, subject to conditions and informative.

Environment Agency

No comments

Crossrail 2 Safeguarding

No objections, subject to conditions and informative.

Transport for London

No objections raised, subject to conditions and legal agreement.

Network Rail

No objection.

London Underground/ DLR Infrastructure Protection

No objection.

Historic England

No comment.

Greater London Archaeological Advisory Service

No comment.

Natural England

No objection.

National Health Service London Healthy Development Unit

To meet the health needs of the new residents of the proposed schemes, and to limit adverse impact on existing residents, developments need to provide financial contributions via the relevant S106 agreement for the expansion of health infrastructure serving the locality. The request is the Council secure £83,000 within the S106 agreement to be paid on commencement and indexed linked to building costs. (Officer comment: Consistent with the position on other applications and as set out in the Council's latest published Annual Infrastructure Funding Statement (April 2024) the need for additional primary health care, acute care, and mental health provision should be addressed by considering the use of Strategic CIL to support new facilities rather than through s106 planning obligations).

## **5. LOCAL REPRESENTATIONS**

5.1 In terms of consultations:

- Neighbouring properties were sent letters
- Site notices were erected in the vicinity of the site
- A notice was put into the local press

5.1.1 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 0  
Objecting: 0  
Supporting: 0

## **6. MATERIAL PLANNING CONSIDERATIONS**

6.1 The main planning issues raised by the proposed development are:

1. Background
2. Principle of the development
3. Tenure and housing Mix
4. Suitability of site for tall buildings
5. Heritage Impacts
6. Design and appearance
7. Residential Quality
8. Impact on Neighbouring Amenity

9. Parking and Highways
10. Sustainability, Energy and Climate Change
11. Urban Greening, Trees and Ecology
12. Flood Risk and Drainage
13. Air Quality and Land Contamination
14. Fire Safety
15. Social and Community Infrastructure
16. Equalities
17. Employment
18. Conclusion

## 6.2 Background

6.2.1 The Chocolate Factory Phase 1 development, approved in February 2019 under planning reference HGY/2017/3020, is currently being built out. The consented scheme comprises a mixed-use development delivering 10,657 square metres of commercial floorspace and 230 new homes. The development was broken down into five buildings;

- The retained Chocolate Factory building;
- Block B;
- Block D;
- Block E1;
- Block E2;
- Block F.

6.2.2 Block D of the Chocolate Factory Phase 1 development would have partly occupied the Mallard Place site. However Block D of Phase 1 would no longer be developed as this proposal would now occupy that part of the Phase 1 development known as the Chocolate Factory Phase 2 development. The approved scheme for Block D comprised a 13-storey building with an adjoining four-storey wing, providing 57 market sale residential units on the upper floors and approximately 570 square metres of commercial floorspace at ground floor level, with a residential mix but predominantly studio and one-bedroom flats.

6.2.3 The current proposal, should planning permission be granted, would essentially result in the proposed western building of the proposed development being built instead of Block D of the extant Chocolate Factory Phase 1 development.

## 6.3 Principle of the development

*National Policy*

- 6.3.1 The National Planning Policy Framework (NPPF) 2024 establishes the overarching principles of the planning system, including the requirement of the system to 'drive and support development' through the local development plan process. It also advocates policy that seeks to significantly boost the supply of housing and requires local planning authorities to ensure their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. Paragraph 86 of the NPPF seeks to be flexible enough to accommodate needs not anticipated in the plan and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.
- 6.3.2 Paragraph 73 of the NPPF notes that 'small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should... support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.'
- 6.3.3 The NPPF was last updated in December 2024. This version of the NPPF was amended on 7 February 2025 to correct cross-references from footnotes 7 and 8 and amend the end of the first sentence of paragraph 155 to make its intent clear. For the avoidance of doubt the amendment to paragraph 155 is not intended to constitute a change to the policy set out in the Framework as published on 12 December 2024.

*Development Plan*

- 6.3.4 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 Haringey's Development Plan includes the London Plan (2021), Haringey's Local Plan Strategic Policies (2017), the Development Management Policies Development Plan Document (2017), and the Site Allocations DPD (2017),

*London Plan*

- 6.3.5 The London Plan 2021 is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance.
- 6.3.6 Table 4.1 of the London Plan 2021 sets out housing targets for London over the coming decade, setting a 10-year housing target (2019/20 - 2028/29) for Haringey of 15,920, equating to 1,592 dwellings per annum.

- 6.3.7 Policy H1 of the London Plan 2021 'Increasing housing supply' states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites.
- 6.3.8 Policy H4 of the London Plan 2021 requires the provision of more genuinely affordable housing. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site.
- 6.3.9 The London Plan 2021 designates Wood Green as an Opportunity Area. The Council's Local Plan 2017 identifies Wood Green as a Growth Area. The site is located within these designations.
- 6.3.10 Policy S1 Part F of the London Plan 2021 states that 'Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:
- 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community
- 6.3.11 Policy S3 of the London Plan 2021 seeks to resist the loss of education facilities.
- 6.3.12 Policy D6 of the London Plan 2021 seeks to optimise the potential of sites, having regard to local context, design principles, public transport accessibility and capacity of existing and future transport services. It emphasises the need for good housing quality which meets relevant standards of accommodation.

*Local plan*

- 6.3.13 Haringey's Local Plan Strategic Policies 2017 (referred to as the Local Plan hereafter) sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision.
- 6.3.14 Policy SP1 of the Local Plan 2017 states that the Council will expect development in Growth Areas to provide a significant quantum of new residential and business floorspace, maximise development opportunities on site, provide appropriate community benefits and infrastructure. The supporting text for this policy identifies several aspirations for Wood Green which include increasing the capacity and variety of uses within the town centre, maximising the capacity for housing and employment growth provision and for development to be in accordance with the relevant Council planning policies and objectives (including those of the site allocations).
- 6.3.15 Policy SP1 also states that the Council will maximise the supply of additional housing by supporting development within areas identified as suitable for growth.

- 6.3.16 Policy SP2 of the Local Plan 2017 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the stated minimum target, including securing the provision of affordable housing.
- 6.3.17 Policy SP8 of the Local Plan 2017 states that the Council will support local employment and will support small and medium sized businesses in need of employment space.
- 6.3.18 The Development Management Development Plan Document 2017 (referred to as the DM DPD hereafter) supports proposals which contribute to the delivery of the planning policies referenced above and sets out its own criteria-based policies against which planning applications will be assessed.
- 6.3.19 Policy DM10 of the DM DPD 2017 states that the Council will support proposals for new housing as part of mixed-use developments.
- 6.3.20 Policy DM13 of the DM DPD 2017 makes clear that the Council will seek to maximise affordable housing delivery on sites.
- 6.3.21 Policy DM49 of the DM DPD 2017 seeks to resist the loss of existing community facilities.
- 6.3.22 Policy DM38 of the DM DPD 2017 sets out that the Council will support proposals for mixed use, employment-led development within a Local Employment Area – Regeneration Area where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace.
- 6.3.23 Policy DM55 of the DM DPD 2017 states that where developments form only a part of allocated sites a masterplan shall be prepared to demonstrate that the delivery of the site allocation and its wider area objectives would not be frustrated by the proposal.

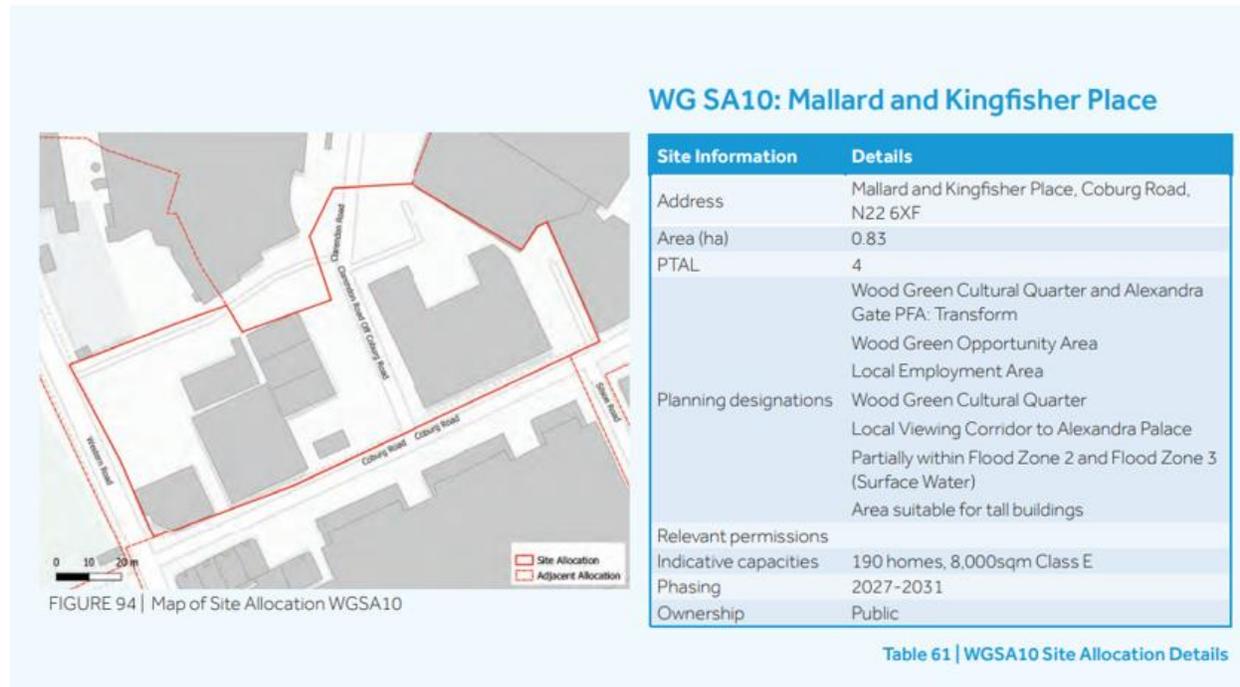
*Draft Local Plan*

- 6.3.24As part of preparing a New Local Plan, the Council has recently consulted on a Draft Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, with the consultation running from 10 October to 19 December 2025.
- 6.3.25Paragraph 48 of the National Planning Policy Framework (NPPF) states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there

are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework.

6.3.26 It is recommended that very limited weight be afforded to the Draft Local Plan's policies as the Draft Local Plan is in the early stages of preparation and has not yet been submitted for examination, the policies in the said Plan may be subject to change as objections to the same can still be made, and the relevant policies in the current Plan are consistent with the relevant policies of the NPPF.

6.3.27 The site is also designated as WG SA10 known as 'Mallard and Kingfisher Place' in the new Regulation 18 Draft Local Plan. Wood Green Site Allocation SA10 which is slightly amended, though, broadly in line with SA19 of the adopted local plan, and expects redevelopment to provide a greater density and mix of employment, workspace and residential uses, supporting the Cultural Quarter. Active frontages and uses, and a dramatically improved public realm are expected as this will create a dynamic, creative environment along Coburg and Clarendon Road, as part of the strategic east-west cultural corridor. The Draft Local Plan only carries very limited weight compared to the Site Allocations DPD which was fully adopted in July 2017 and has full weight as part of the Development Plan; given the Reg 18 consultation on the draft Local Plan has recently closed.



6.3.28 The Site Allocations Development Plan Document 2017 (SA DPD) gives effect to the Local Plan spatial strategy by allocating sites to accommodate the development needs of the Borough. Developments within allocated sites are expected to conform to the guidelines of the relevant allocation unless there is strong justification for non-compliance.

6.3.29 The site is designated as Site Allocation SA19 ‘Wood Green Cultural Quarter (South)’ in the Council’s Site Allocation Development Plan Document 2017 which seeks to enhance the Wood Green Cultural Quarter through improvements to the Chocolate Factory and creation of high quality urban realm and comprehensive redevelopment of the remaining sites for employment-led mixed-use development with residential.



Fig 2: Site Allocation SA19 ‘Wood Green Cultural Quarter (South)’

6.3.30 Site allocation SA19 of the SA DPD 2017 has the following Site Requirements and Development Guidelines:

Site requirements

- Development proposals will be required to be accompanied by a site wide masterplan
- The original Chocolate Factory building will be retained
- Parma House, the Mountview Academy building, the buildings fronting Coburg Road east of Clarendon Rd, and the extension to the Chocolate Factory will all be permitted for demolition, subject to alternative premises for viable uses to being retained and/or re-provided.
- The development should demonstrate that the maximum quantum of employment floorspace has been provided, subject to viability
- Uses that positively support the enhancement of the cultural quarter will be expected as part of any redevelopment
- This site should preserve the setting of the adjoining Wood Green Common conservation area and its significance
- In collaboration with neighbouring sites SA18 & SA20, a coordinated approach will be sought to the provision of an enhanced public realm to be created in the north of this site, which will act as the focal point of the Cultural Quarter around Clarendon Road. Active frontages to both sides of Clarendon Road will be required, to contribute to this vision.
- A public realm will be created that will act as the focal point for the Cultural Quarter in this the site around Clarendon Road
- Active frontages to both sides of Clarendon Road will be required, which contribute to the cultural output of the area
- Development should follow the principles set out in any future Council-approved masterplan, and the Wood Green Area Action Plan (AAP)
- Clarendon Road will be enhanced and provide a north-south pedestrian and cycling connection through the site
- Affordable rent housing may be sought having regard to the viability of the scheme as a whole, in line with Policy DM38
- This site falls within a Regeneration Area, and as such employment-led mixed-use development will be appropriate here
- Development should have regard to the adjoining site allocations (SA18 & SA20) and follow the principles set out in any future Wood Green AAP
- This site is subject to the requirements of Policy DM38 - Employment-Led Regeneration.

### Guidelines

- Development should be set back adjacent to the Western Road/Coburg Road to mark the entrance to the area from Alexandra Palace via the Penstock foot tunnel.
- New development here will form a key site in the creation of a new suburb of Wood Green, with a requirement to engage with distinctive new architecture.

- Clarendon Road will be extended through Guillemot Place to connect Wood Green Cultural Quarter to Wood Green Common, and Alexandra Palace Station.
- A new active frontage to Western Road should be created.
- Coburg Road may become part of a predominantly cycle and pedestrian route linking Wood Green with Alexandra Palace and the west of the borough through the Penstock foot tunnel.
- Development contributions for a dedicated cycle and pedestrian crossing of Western Road into the Penstock Tunnel should be secured through development on this site.
- This site is identified as being in an area with potential for being part of a decentralised energy network. Proposals should reference the Council's latest decentralised energy masterplan regarding how to connect, and the site's potential role in delivering a network within the local area.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.
- A piling statement will be required prior to any piling taking place.
- Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.

6.3.31 The proposed development should be in general accordance with these adopted objectives unless material considerations indicate otherwise. These matters will be assessed in the relevant sections below.

### **Masterplanning and Site Allocation**

6.3.32 Site Allocation SA19 (Wood Green Cultural Quarter (South)) of the Site Allocations Development Plan Document (DPD) 2017 requires development proposals to be supported by a site-wide masterplan. Policy DM55 of the Development Management DPD further states that where proposals come forward on part of an allocated site, a masterplan should be provided to demonstrate that the delivery of the wider allocation and its objectives would not be prejudiced.

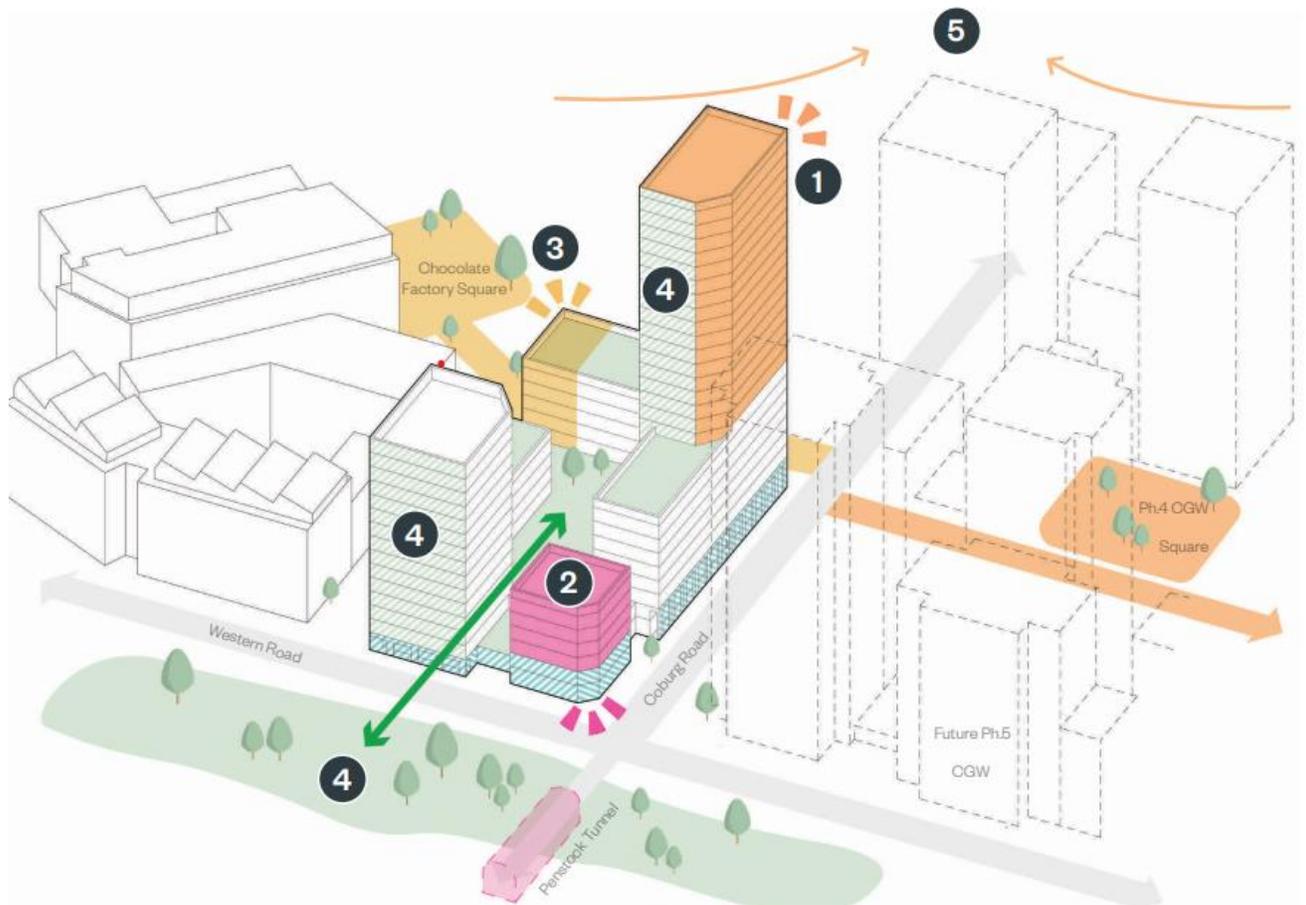
6.3.33 The applicant has submitted an indicative masterplan option to demonstrate compliance with the requirements of SA19 of the SA DPD 2017 and to confirm that the proposal would not compromise the coordinated development of the remaining land within the allocation. The wider SA19 site includes Raphael House, Units 123, Kingfisher Place, and land at the Chocolate Factory and Parma House, which received planning permission in February 2019 under reference HGY/2017/3020 for a mixed-use development comprising 10,657 square metres of commercial floorspace and 230 residential units (known as Chocolate Factory Phase 1) and is currently under construction.

6.3.34 The indicative masterplan illustrates the potential for redevelopment of the entire urban block, through the current application and compatible schemes on adjoining sites, including Raphael House immediately to the west and Units 1,2,3 Kingfisher

Place, with a frontage onto Clarendon Road. The proposed massing would complete the urban block while maintaining appropriate levels of daylight to the podium garden and allowing outward views from the site.

6.3.35 The indicative massing associated with Raphael House responds to the Penstock Tunnel improvements and the key pedestrian route leading towards Alexandra Palace. This location presents an opportunity for a distinctive marker building; alternatively, should redevelopment not come forward, the site could complement the new Penstock installations through its redevelopment as a small pocket park. The Design Officer advises that in light of the need to safeguard the amenity of existing and future residents, including those within this scheme, if approved—it is highly unlikely that a third or fourth tall building within this city block could be acceptable. The current proposal represents the appropriate upper limit of height and massing for its location.

6.3.36 Units 1,2,3 and Kingfisher Place could provide an active frontage onto Clarendon Road, helping to define the street edge and strengthen the visual and functional relationship with Chocolate Factory Square, as established under the Land at the Chocolate Factory Phase 1 permission (planning reference HGY/2017/3020).



- 1 'Cultural Quarter' marker tower from Clarendon Gasworks Square
  - 2 Penstock Tunnel gateway marker between Alexandra Palace and Wood Green
  - 3 Connection to 'Chocolate Factory Square' Gas
  - 4 Green connection to Alexandra Palace
  - 5 Marker tower sits as part of cluster within Wood Green skyline
- Key**
-  Connection to Alexandra Palace
  -  Commercial frontage
  -  Green connection
  -  Connection to 'Clarendon Square'
  -  Gateway and connection to Penstock Tunnel
  -  Connection to 'Chocolate Factory Square'
  -  Tower sitting as part of Cluster within Wood Green skyline

*Fig 3: Indicative Masterplan – Redevelopment of the whole urban block*

6.3.37 The indicative masterplan incorporates the adjacent undeveloped sites and demonstrates that the remaining parts of the allocation could accommodate additional employment floorspace and residential development to meet the outstanding requirements of SA19 (Figure 3).

6.3.38 It is noted that the previously approved 13-storey tower comprising 57 homes within Block D, approved under the Land at the Chocolate Factory and Parma House permission (Chocolate Factory Phase 1 – planning permission reference HGY/2017/3020), is no longer being delivered as part of that consent (should planning permission be granted for this proposal) and the land now forms part of the current application site. As a result, the number of dwellings delivered under Chocolate Factory Phase 1 is reduced to 173, leaving a remaining 182 homes expected to be delivered within the site allocation. The total number of homes proposed across Allocation SA19 would therefore be 323 units, which includes the 150 homes proposed here which is within, and close to achieving, the indicative housing target set out in the allocation.

Existing and Proposed  
Workspace/ Residential

COMPLETED	1	Chocolate Factory Ph1 (Building A) : Refurbished <i>Employment Class B1 - 8,343 Sqm.</i>
CONSENTED	2	Chocolate Factory Ph1 (Building E2): New build <i>Employment Class B1 - 366 Sqm.</i> Homes - 80
	3	Chocolate Factory Ph1 (Building E1): New Build <i>Employment Class B1 - 546 Sqm.</i> <i>Retail Class A1/A3 - 103 Sqm.</i> Homes - 29
	4	Chocolate Factory Ph1 (Building F): New Build <i>Employment Class B1 - 729 Sqm.</i>
PROPOSED	5	Parma House: Change of use and additional storey <i>Non residential Class E - 200 Sqm</i> Homes - 60
	6	Mallard Place - Proposed New Build <i>Non residential Class E Workspace - 475 Sqm</i> Homes - 150
KINGFISHER	7	Mallard Place Extended Sites - Proposed New Build <i>Non residential Class E Workspace - 140 Sqm</i> Homes - 40-50
	8	Kingfisher Site <i>Non residential Class E Workspace - 1,454 Sqm. min.</i> <i>(to achieve SA19 12,243 Sqm.target.)</i> Homes - No. of homes met

*Kingfisher Existing Building Footprint (1,464 Sqm):  
Over two storeys a GIFA of 2,928 Sqm. would achieve the  
SA19 allocation area.*

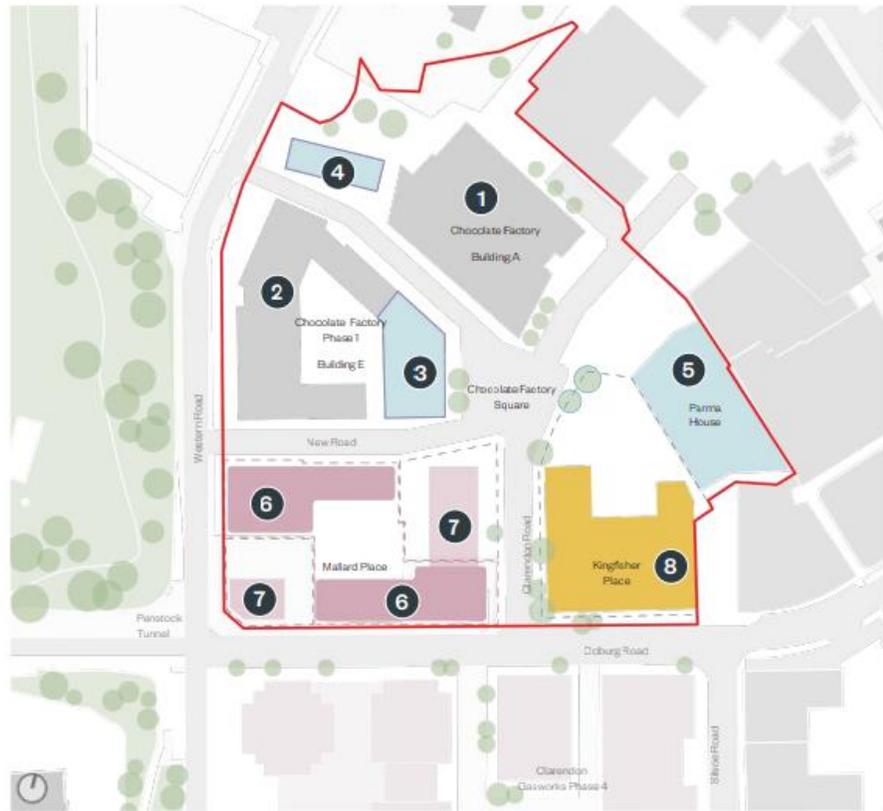


Fig 4: Indicative Masterplan – Existing and proposed workspace/residential

6.3.39 The indicative masterplan further identifies opportunities to deliver:

- A key marker building addressing Chocolate Factory Square;
- A new north–south ‘makers’ route along Silsoe Road;
- A strong commercial edge to the emerging Civic Boulevard;
- Enhanced public realm along the principal north–south pedestrian link; and
- The rationalisation of Chocolate Factory Square around a key anchor institution.

Opportunities

- 1 Key Chocolate Factory Square Marker Building
- 2 New 'makers' North-South route (Silsoe Road)
- 3 Strong commercial edge to emerging 'Civic Boulevard'
- 4 Opening public realm along key North-South Link
- 5 Rationalise Chocolate Factory Square
- 6 Key Anchor Institution

- Key**
- |  |   |
|--|---|
| Site Allocation 19   | Residential Entrances                     |
| Key marker building  | Commercial Frontage                       |
| Emerging North-South route connecting proposed public squares        | Commercial Entrances                      |
| Aspirational link between north-south route to wider area            | Activate frontage                         |
| Potential Yard and cultural quarter link                             | Emerging urban squares                    |
| East-West link between Alexandra Palace and Wood Green high street   | Proposed Mallard Place Building Footprint |
| Local Heritage Asset   | Key corner to Chocolate Factory square    |
| Key Heritage Anchor  | Key marker at axis intersection           |
| Residential frontage-relationship between frontages to be considered | Opening the public realm                  |
|  | Existing parking                          |
|  | Existing Trees                            |

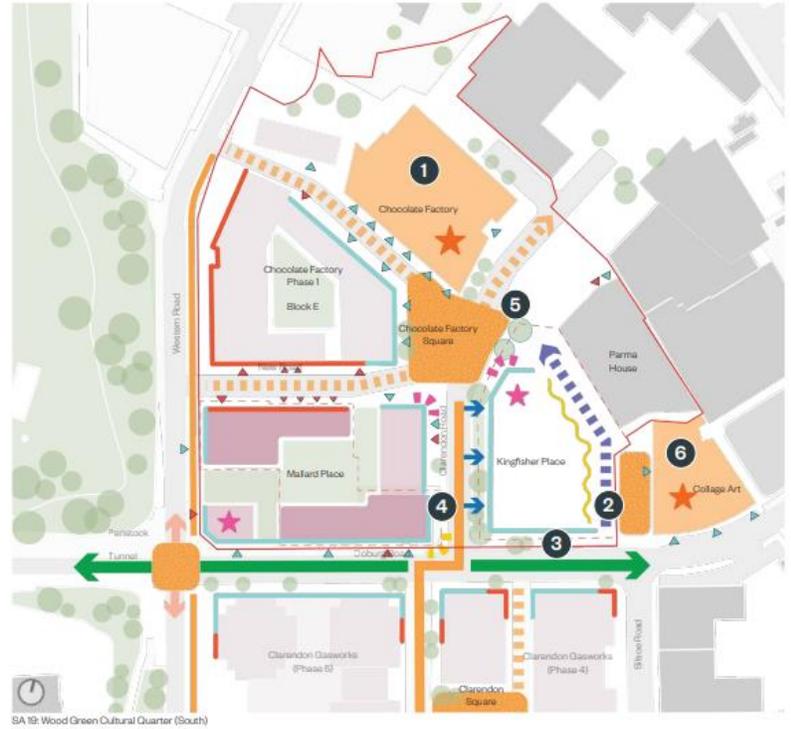


Fig 5: Indicative masterplan - Opportunities

6.3.40 Officers acknowledge that fragmented land ownership across adjacent sites, and the limited current appetite from some landowners for site assembly or redevelopment, means that comprehensive redevelopment of the entire allocation cannot presently be achieved.

6.3.41 Notwithstanding this, it is considered that the proposal is supported by a coherent and deliverable indicative masterplan, which clearly demonstrates how the site and surrounding link land could be developed over time to meet both the employment and residential requirements of Site Allocation SA19. The proposal is therefore considered to accord with the requirements of Policy DM55 of the Development Management DPD and Site Allocation SA19 of the Site Allocations DPD 2017.

**Draft Wood Green Site Allocation**

6.3.41

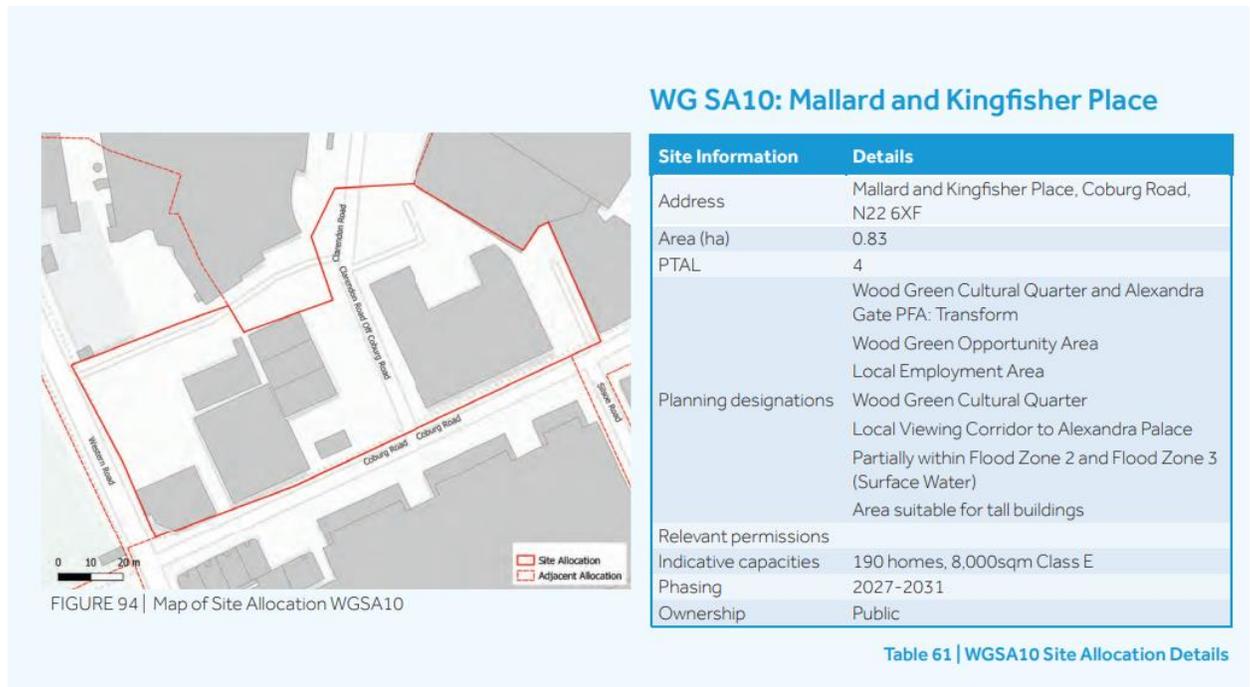


Fig 6: Wood Green Site Allocation SA10 'Mallard and Kingfisher Place'

## 5 Year Housing Land Supply

6.3.42 Overall, Haringey has a supply of deliverable sites over the next five years to deliver 10,504 homes. This equates to a housing land supply of 5.18 years. To demonstrate a 5 year housing land supply the Council must have land available to deliver 10,127 net additional homes over the five-year period April 2024 to March 2029.

6.3.43 Decisions must be made in accordance with the development plan (relevant policies summarised in this report) unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

## Land Use Principles

6.3.44 The proposed development, would replace an existing college for people with special education needs with a mixed-use development comprising new homes and employment floorspace.

### *Loss of community use*

6.3.45 Policy DM49 'Managing the Provision and Quality of Community Infrastructure' of the DM DPD states that .....B) *where a development proposal may result in the loss of a facility, evidence will be required to show that:*

- a) the facility is no longer required in its current use;*
- b) the loss would not result in a shortfall in provision of that use;*
- c) the existing facility is not viable in its current use and there is no demand for any other suitable community use on site*

6.3.46 Policy S1 'Developing London Social Infrastructure' of the London Plan states that .....*development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:*

- 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or;*
- 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services*

6.3.47 The proposed development would result in the loss of the existing special educational needs college known as 'John Dewey Specialist College/Area 51 Education' currently operating from the site. The Council recognises the importance of this facility and the need to ensure continuity of provision for its users. The applicants are currently working proactively with the college to identify and secure a suitable alternative location that meets its operational and accessibility requirements. The GLA Stage 1 comments state that GLA officers acknowledge that the loss of educational use on site has been agreed by the Council and an alternative suitable site is being explored and confirmation must be provided that an alternative site has been identified for the college. This matter is being actively progressed by the Council who have agreed to find a suitable alternative site prior to the commencement of the proposed development. No demolition would be allowed to proceed unless and until an alternative premises is secured and this would be secured by the Director's Letter.

6.3.48 Notwithstanding this, it is also relevant to note that the existing special educational needs college use does not provide the land uses (and general aims) of the site allocation which seeks employment and residential use on this site. Subject to the re-provision of the college being secured through an appropriate measure to prevent the redevelopment of the site taking place until suitable alternative accommodation has been secured by the Council, the proposed redevelopment would therefore bring the site into conformity with the adopted site allocation and wider spatial planning strategy.

### **Proposed mixed use – Employment and Residential Uses**

#### *Employment*

6.3.49 Site Allocation SA19 identifies the site for a mixed-use development comprising employment and residential uses. The site allocation identifies an indicative capacity of 12,243 square metres of employment floor space across the allocation as a whole.

6.3.50 The site also forms part of a designated Local Employment Area: Regeneration Area (RA), where Policy DM38 applies. Policy DM38 of the Development Management DPD states:

6.3.51 *The Council will support proposals for mixed-use, employment-led development within a Local Employment Area - Regeneration Area where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. In addition to complying with other policy requirements, proposals must:*

- a. Maximise the amount of employment floorspace to be provided within the mixed use scheme;*
- b. Provide demonstrable improvements in the site's suitability for continued employment and business use, having regard to:*
  - i. The quality, type and number of jobs provided, including an increase in employment densities where appropriate;*
  - ii. Flexibility of design to enable adaptability to different business uses over the lifetime of the development; and*
  - iii. Environmental quality of the site.*
- c. Make provision for an element of affordable workspace where viable;*
- d. Ensure an appropriate standard of amenity for the development's users and neighbours, particularly where new residential floorspace is introduced as part of a mixed-use scheme;*
- e. Not conflict with or inhibit the continued employment function of the site and nearby employment sites; and*
- f. Be designed to enable connection to ultra-fast broadband.*

6.3.52 The proposed development would redevelop a portion of the remainder of the site (within SA19) with a scheme providing a mixed-use scheme consisting of residential and employment floorspace. The development proposes 539 square metres of employment floorspace. Site Allocation SA19 identifies an indicative development capacity of 12,243 square metres of employment floor space across the allocation as a whole. The proposed employment floorspace, in conjunction

with the Land at Chocolate Factory and Parma House development, (part of SA19, which have planning permission and is currently being built out – reference HGY/2017/3020) would equate to 11,196 square metres of employment floor space across the site allocation. The applicant submitted an indicative masterplan illustrating how the rest of the site within the site allocation could be developed to collectively provide the remaining 1,047 square metres of employment space in the future to deliver the overall required 12,243 square metres of employment space across the whole of the site, which is further explained as to how this can be achieved below.

- 6.3.53 Whilst there would be a shortfall in reaching the required employment floorspace when taking account of the Chocolate Factory permission and the current application, the adjacent sites i.e. Kingfisher Place, Units 123 and Raphael House also within SA19, are yet to come forward for development and have the potential to further increase the employment capacity and overall requirement of employment floorspace as set out in SA19. The applicants have demonstrated through the indicative masterplan that Raphael House and Units 1,2,3 have the potential to deliver approximately 140 square metres of employment floorspace, while Kingfisher Place could accommodate a further 1,454 square metres of employment floorspace.
- 6.3.52 The proposed employment provision comprises flexible commercial floorspace (Use Class E) at ground and first floor levels across the development, to ensure that the commercial units remain viable and capable of being occupied. The space would be delivered to a shell-and-core specification, providing a high degree of flexibility for future occupiers. This specification would allow the floorspace to be readily subdivided to accommodate more than one commercial occupier, if required, thereby optimising the marketability and long-term viability of the units.
- 6.3.54 The existing site represents an inefficient use of land, characterised by low employment density and largely inactive frontages. In contrast, the proposal seeks to deliver 539 square metres of high-quality, flexible commercial floorspace, maximising active frontages along Western Road, Coburg Road and Clarendon Road. Furthermore, the proposed ground-floor commercial frontage would be double-height, reinforcing a strong commercial character and contributing positively to the streetscene.
- 6.3.55 The proposed commercial provision would result in a higher jobs-to-floorspace ratio than the current use (7.5 full time jobs) and is estimated to support up to 28 jobs, although the final number of employees will be dependent on the nature of the end users.
- 6.3.56 The level of employment floorspace proposed is considered appropriate, striking a suitable balance between employment provision and the delivery of an acceptable quantum of residential development in this accessible location, providing a good standard of residential amenity for future occupants. It is anticipated that commercial operators would be primarily those able to sustain their businesses through custom from residents within the development and the surrounding area.

- 6.3.5 One of the key aims of the council is to support the local economy and job opportunities within the Borough. Therefore, there is an aspiration for the applicants to provide affordable workspace as part of the commercial space on the ground and first floor, and which would be flexible in terms of commercial employment generating uses. This is wholly supported and has been secured by legal agreement. Notwithstanding this, there is potential for the remaining sites within the wider site allocation to deliver additional affordable workspace, this is considered acceptable in principle.
- 6.3.58 It is acknowledged that construction activity associated with the development may have temporary impacts on the day-to-day operation of neighbouring sites. However, redevelopment activity would be time-limited and would not result in a long-term adverse impact on surrounding employment uses. Any potential effects would be appropriately mitigated through the Directors agreement letter, securing a Construction Demolition Plan.

### **Residential Use**

- 6.3.59 The proposal would deliver 150 self-contained homes, contributing towards meeting the Borough's identified housing targets and supporting the objectives of Site Allocation SA19 which identifies an indicative development capacity of 355 residential homes across the allocation as a whole. The proposed residential homes, in conjunction with the Chocolate Factory Phase 1 extant permission would equate to 323 residential units which is within, and close to achieving, the indicative housing target set out in the allocation.

### **Conclusion**

- 6.3.60 The proposed development for the site would be in accordance with and contribute to the land use planning requirements of the site allocation (SA 19) as a whole, which is, overall, for employment-led mixed-use development with residential, as well as achieving the required wider aims and objectives. The provision of these land uses on the site is also supported by regional and local planning policy, as described above.
- 6.3.61 For these reasons the proposed development is acceptable in principle in land use terms, subject to all other relevant planning policy and other considerations also being acceptable as discussed below.

## **6.4 Tenure and Housing Mix**

### *Tenure*

- 6.4.1 The NPPF 2021 states that where it is identified that affordable housing is needed, planning policies should expect this to be provided on site in the first instance. The London Plan also states that boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low cost rented units
- 6.4.2 Policy H4 of the London Plan 2021 requires the provision of more genuinely affordable housing. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site.
- 6.4.3 Policy SP2 of the Local Plan 2017 states that the Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the stated minimum target, including securing the provision of affordable housing.
- 6.4.5 Policy DM13 of the DM DPD 2017 makes clear that the Council will seek to maximise affordable housing delivery on sites.
- . 6.4.6 The proposed development forms part of the Council's Housing Delivery Programme which seeks to optimise the provision of affordable accommodation for rent to meet local need. The programme is part funded by the GLA and is informed by the Local Plan and the Council's Housing Strategy. It aims to address the Council's housing waiting list and specialist housing need through the provision of a wide range of housing typologies across all the sites identified, manage issues relating to the over and under occupation of the existing housing stock, and ensure the effective use of public assets and funding.
- 6.4.7 This proposal seeks to provide 100% of the housing for general needs low cost rented housing which would make a valuable contribution to Council housing supply and would align with the above planning policy requirements. The proposal would therefore contribute to a mixed and balanced community and make a significant contribution to the delivery of the Borough wide affordable housing target.

### **Housing Mix**

- 6.4.8 Policy H10 of the London Plan 2021 states that schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, it advises that regard is made to several factors. These include robust evidence of local need, the requirement to deliver mixed and inclusive neighbourhoods, the nature and location of the site (with a higher proportion of one and two bed homes generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity), and the aim to optimise housing potential on sites.

6.4.9 Policy SP2 of the Local Plan 2017 and Policy DM11 of the Council's DM DPD 2017 adopts a similar approach.

6.4.10 Policy DM11 of the DM DPD 2017 states that the Council will not support proposals which result in an over concentration of 1 or 2 bed units overall unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes.

6.4.11 The overall mix of housing within the proposed development is as follows:

Unit type	Total homes	%	Wheelchair accessible (M4 3)
1 bed	51	34%	
2 bed	67	44.7%	6
3 bed	28	18.7%	9
4 bed	4	2.7%	
<b>TOTAL</b>	150	100%	10%

6.4.12 The overall mix of housing within the Chocolate Factory phase 1 extant permission was as follows:

Unit type	Total homes	%
<b>Studios</b>	<b>29</b>	<b>13%</b>
1 bed	98	42%
2 bed	72	31%
3 bed	29	13%
4 bed	2	1%
<b>TOTAL</b>	230	100%

6.4.12 Twenty-eight of the proposed homes (18.7%) would comprise three-bedroom family-sized units, with a further four homes (2.7%) comprising four-bedroom family-sized units. This substantial provision of family-sized homes would help to avoid an over-concentration of smaller units and would make a positive contribution towards meeting identified local and borough-wide housing needs. Notwithstanding this, the applicant has also confirmed that there is a strong need for one-bedroom social rented homes. It is also noted that Phase 1 of the Chocolate Factory extant permission also provided a substantial provision of family sized homes and given that the proposed western building of the proposed development is being built instead of Block D of the extant Chocolate Factory

Phase 1 permission, the number of studios for this phase would be significantly reduced.

- 6.4.13 Overall, the development would deliver a balanced mix of dwelling sizes, supporting the creation of a mixed and inclusive neighbourhood. The proposed housing mix is therefore considered acceptable and in accordance with the relevant planning policies.

## **6.5 Suitability of site for tall buildings**

- 6.5.1 Policy D3 of the London Plan 2021 states that all development must make the best use of land by following a design-led approach that optimises site capacity.

- 6.5.2 Policy D9 of the London Plan 2021 states that local development plans should define what is considered a tall building, and that buildings should not be considered 'tall' where they are less than six storeys (or 18 metres) in height. Policy D9 also states that boroughs should determine the locations where tall buildings may be an appropriate form of development and that tall buildings should be located in areas identified as suitable in local development plans.

- 6.5.3 Policy SP11 of the Local Plan 2017 states that tall buildings should be assessed in accordance with area action plans, characterisation studies and the policy criteria of the DM DPD. The design officer notes that the council prepared a borough-wide Urban Characterisation Study (UCS) in 2016 which supported tall buildings in this wider Wood Green-Haringey Heartlands major development area and specifically, that height should rise in this specific location, as one of four high points, marking the centre of the Heartlands regeneration area, the envisaged central town square and the western end of the new east-west route from the High Road to Heartlands, connected to the onward western route via the Penstock Tunnel to Alexandra Park. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the much more sensitive west side of the railway being a much quieter, parkland dominated neighbourhood than the east, as well as the railway corridor being at its widest beside this part of Heartlands, giving a much greater distance, with the broad, wooded embankments providing further buffering between the two areas.

- 6.5.4 Policy DM6 of the DM DPD 2017 states that tall buildings will only be acceptable within identified areas. Figure 2.2 of the DM DPD 2017 identifies the area around Wood Green, as being suitable for tall buildings. It also prescribes a range of requirements for tall buildings. Policy DM6 of the DM DPD 2017 further states that *...as well as being located in suitable areas and being acceptable in design terms, tall buildings should be a way finder or marker building indicating areas of civic importance and high visitation, should be well proportioned and visually interesting from any distance or direction and should positively engage with the street environment.* Tall buildings should also consider their ecological and microclimate

impacts. Clusters of tall buildings should also demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for an area.

- 6.5.5 Policy SP11 of the Local Plan 2017 and Policy DM6 of the DM DPD 2017 defines 'tall' buildings as those 'which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London.
- 6.5.6 The proposed development ranges in height from 2 to 22 storeys. The eastern building is proposed as a 22-storey building with an 8-storey wing. The western building is proposed as a 14-storey building with a 6-storey wing. The buildings will be sited around a two-storey podium. Both the east and west tower meet the definition of a tall building.
- 6.5.7 The location of the proposed tall buildings are within the area designated as being suitable for tall buildings area as identified in Table 2.2 of Policy DM6 of the DM DPD 2017.
- 6.5.8 The GLA's Stage 1 response supports the proposed height and massing strategy, noting that it is appropriate to the site's context.
- 6.5.9 The impacts of the tall buildings have been carefully considered, with the siting of two taller elements forming a coherent and well-resolved composition. The 22-storey building responds to the primacy of key pedestrian routes along Clarendon Road and Coburg Road and relates positively to the emerging cluster of tall buildings proposed within Phases 4 and 5 to the south. The 14-storey building is consistent with the scale of the consented Chocolate Factory Phase 1 Block D and provides a suitable transition between the taller buildings to the south and the lower to mid-rise development to the north. It is also noted that the location and extent of the taller elements are largely informed by the Crossrail 2 safeguarding constraints.
- 6.5.9 The Council's Design Officer notes that the height and massing of the scheme's components respond appropriately to their immediate street context, both in the towers and in the shoulder wings. The tallest tower is positioned to emphasise the primary junction at Coburg Road and Clarendon Road, while a smaller tower marks the less significant intersection of Western Road with the new east-west street. Similarly, the southern shoulder wing rises to eight storeys along Coburg Road, whereas the northern shoulder wing steps down to six storeys to reflect the more residential character of the new east-west street. The relationship of the tallest tower with the tallest tower of phase 5 of the Alexandra Gate development along Coburg Road which is yet to come forward as a reserved matters application sits on diagonal corners of a major crossroads, with the proposed tall building directly facing, across the considerable width of Coburg Road (approx. 17m), a lower, 16 storey block in their Phase 5, and the north-south street, such that this will be visible for a considerable distance to the south up that key street. It will therefore

fit into the “checkerboard” pattern of tall buildings alternating with lower buildings and open space.

6.5.10 The consideration of the tall buildings as a function of the overall development design and its impact on local character, protected views, local climatic conditions, and all other relevant matters will be assessed in the sections below.

#### *Visual Impact*

6.5.11 Policy D9 of the London Plan states that where suitable tall buildings must be acceptable in terms of their visual, functional, environmental and cumulative impacts.

6.5.12 Policy DM5 of the DM DPD 2017 states that obstructions to locally significant views should be minimised.

6.5.13 The Heritage, Townscape and Visual Impact Assessment (HTVIA) confirms that the scheme has been robustly assessed from an agreed range of local, intermediate and long-distance viewpoints. The Design Officer considers that the proposed development has the potential to operate as a set of genuine ‘landmarks’ within the wider masterplan—acting as wayfinding elements, terminating key vistas along Coburg Road and Western Road, and marking the principal crossroads on the two main north–south routes intersecting with Coburg Road. The buildings are also judged capable of functioning as landmarks in their own right by virtue of being elegant, well-proportioned and visually engaging from all directions.

6.5.14 While the taller elements will be perceptible at distance from within the Wood Green Common Conservation Area, Officers consider that their presence would not result in harm to any heritage assets or their settings.

6.5.15 The Conservation Officer notes that the proposed development would alter the built and visual setting of several locally listed assets, including Cambridge House, the Duke of Edinburgh Public House and Tower Terrace. The Accurate Visual Representation (AVR) images also confirm that the tallest building within the scheme would be visible in views from Alexandra Park and would break the skyline when seen from the Alexandra Palace viewing platform. Importantly, these changes would not affect any London View Management Framework (LVMF) strategic views. The resulting impact on the significance of the Registered Park and Garden is assessed as a very low level of less-than-substantial harm.

6.5.16 Notwithstanding this limited level of harm, the Conservation Officer acknowledges that the proposed building heights are consistent with emerging neighbouring developments and are considered acceptable within this urban context. The overall

planning balance is addressed in section 6.6 of the Officer's Report, where these heritage impacts are weighed against the wider public benefits of the scheme.

- 6.5.17 The applicant has submitted a Heritage Townscape and Visual Impact Assessment (HTVIA) with the application which has assessed the visual and cumulative impacts of the tall buildings in this location. The assessment states that the proposed development will be visible from a number of locations, but will be contextualised by the existing and emerging development. It will form part of a layered and varied skyline, contributing to the evolving identity of the Wood Green Opportunity Area. The scheme would not adversely impact visual receptors, with effects ranging from none to moderate beneficial, and is considered to enhance wayfinding and reinforce the emerging character.
- 6.5.18 The GLA's Stage 1 comments have raised no objection to the impact of the proposed tall building in terms of its overall height, massing, location and impact on townscape views. The Council's Design and Conservation Officers also raise no objections to the height and townscape impact of the tall buildings.

#### *Functional Impact*

- 6.5.19 The functional impacts of the proposed tall buildings have been carefully considered in accordance with Policy D9 of the London Plan 2021. The scheme provides safe and inclusive access with step-free entrances, well-designed circulation spaces, appropriate lift provision and multiple stair cores proportionate to the scale of development. Fire safety has been addressed through submission of a Fire Statement, with the Health and Safety Executive / Building Safety Regulator raising no objection.
- 6.5.19 Servicing, refuse and cycle storage arrangements are fully integrated and designed to operate efficiently without conflict with pedestrian movement or public spaces. The location and height of the tall buildings have been informed by the Crossrail 2 safeguarding zone to ensure no unacceptable impact on strategic infrastructure. It is considered that the inclusion of employment and town centre activities is an intrinsic and important component of the scheme. The development has been carefully designed to accommodate and appeal to a broad range of potential employment and town centre uses. The placement of active ground-floor uses is driven by the objective of increasing footfall and activity across the site, with no concerns regarding overcrowding.

6.5.20 The Transportation Officers have been closely involved throughout all stages of the project, including the wider masterplan, the detailed design of earlier phases, and the detailed design of this phase, ensuring that transport considerations are fully integrated into the scheme.

#### *Environmental impact*

- 6.5.21 In accordance with Policy D9 of the London Plan 2021, the environmental impacts of the proposed tall buildings have been assessed, including wind microclimate,

daylight and sunlight. The Wind Microclimate Study identifies limited, localised wind effects on two balconies at the south-western corner of the east tower wing; these are to be mitigated through the introduction of a brick pier and would not therefore result in any wind safety concerns. Two balconies at the south-eastern corner of the west tower wing require additional mitigation, and the design has been updated to include raised porous end panels to ensure acceptable conditions.

- 6.5.22 Ground-level wind conditions would be suitable for all building entrances, thoroughfares and the communal podium. With the proposed mitigation measures in place, all balconies would also experience acceptable wind comfort. The assessment further indicates that the approved Alexandra Gate (formerly Clarendon Square) Phase 4 development and the forthcoming Phase 5, which is yet to come forward as a reserved matters application, would generally result in calmer wind conditions. The applicant has undertaken extensive wind-tunnel testing and is satisfied that the proposals would not give rise to any adverse wind-generated noise around the building. Officers concur with this assessment.
- 6.5.23 Overall, the proposal is considered to appropriately mitigate environmental impacts associated with the height and scale of the buildings. These impacts are further assessed in the report below. Overall, the proposal demonstrates that the tall buildings would function safely and effectively within their urban context, in accordance with Policy D9.

## **6.6 Heritage Impacts**

- 6.6.1 The application site does not fall within a conservation area and there are no listed structures or buildings on the site. However, the site is located adjacent to Wood Green Common Conservation Area.

### *Policy Context*

- 6.6.2 Policy HC1 of the London Plan 2021 seeks to ensure that development proposals affecting heritage assets and their settings, should conserve their significance. This policy applies to designated and non-designated heritage assets. Policy SP12 of the Local Plan 2017 and Policy DM9 of the DM DPD 2017 sets out the Council's approach to the management, conservation and enhancement of the borough's historic environment.
- 6.6.3 Policy DM9 of the DM DPD 2017 states that proposals affecting a designated or non-designated heritage asset will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance; setting out a range of issues which will be taken into account. The policy also requires the use of high-quality matching or complementary materials, in order to be sensitive to context.

- 6.6.4 Site allocation SA19 of the SA DPD 2017 seeks to preserve the setting of the adjoining Wood Green Common Conservation Area and its significance.

*Statutory tests*

- 6.6.5 Section 72(1) of the Listed Buildings Act 1990 provide: ‘In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.’ Among the provisions referred to in subsection (2) are ‘the planning Acts’.
- 6.6.6 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that “Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”
- 6.6.7 The case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council sets out that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving of listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight. This does not mean that an authority’s assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.
- 6.6.8 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs

to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given 'considerable importance and weight' in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

- 6.6.9 The Conservation Officer advises that the proposed scheme forms part of an emerging tall-building redevelopment area located immediately south of the Wood Green Common Conservation Area. The site also fronts the Alexandra Palace and Park Conservation Area and the Hornsey Waterworks Conservation Area, both situated just west of the Great Northern Railway Line and directly opposite the development site.
- 6.6.10 The site lies within the wider setting of several designated heritage assets, including the Grade II listed Alexandra Palace, the Grade II registered Alexandra Park, and the Grade II\* listed Dominion Centre (former Gaumont Cinema). In addition, a number of locally listed buildings lie in close proximity, including No. 83 Mayes Road (Duke of Edinburgh Public House), Cambridge House, and the terrace of locally listed houses along Tower Terrace.
- 6.6.11 The Conservation Officer has advised that it is evident that the proposed development would affect the built and visual setting of these locally listed assets. The tallest building would introduce an additional, competing and visually noticeable element in the foreground of views, particularly those of Tower Terrace and Cambridge House when seen from Wood Green Common across the Conservation Area. Taking into account the pre-existing impact of approved high-rise development in the vicinity, it is concluded that the proposed scheme would result in a low level of less-than-substantial harm to the significance of these three local heritage assets.
- 6.6.12 The Conservation Officer advises that It is considered unlikely that the proposal would affect the significance of the statutory listed buildings assessed, given the limited intervisibility between the sites. However, the AVR images demonstrate that the tallest building would be a prominent feature in views from Alexandra Park and would breach the skyline when viewed from the Alexandra Palace viewing platform. While this would not affect any London View Management Framework (LVMF) strategic view, it would result in a very low level of less-than-substantial harm to the significance of the Registered Park and Garden.
- 6.6.13 The Conservation Officer considers that the harm would be less than substantial and at a low level making Paragraph 215 and 216 of the NPPF relevant. The Conservation Officer concludes that the proposed scheme is acceptable from a conservation perspective as it will lead to a very low, less than substantial harm, to the significance of the conservation area and its assets and that the proposed heights are consistent with emerging neighbouring developments and are

considered acceptable in this urban context. The design quality of the scheme is recognised as strong and is addressed in detail by the Design Officer.

6.6.14 Officers consider this low level of harm would be more than outweighed by the several significant public benefits of the proposed development namely the provision of 100% affordable housing at social rent level, the provision of good quality family housing, the provision of high quality accessible housing which will meet the Council's sustainability objectives, the enhancement of the townscape, landscape, and public realm along Coburg Road, Western Road, Clarendon Road and New Street. Also, the provision of high-quality flexible Class E commercial floor space is a positive factor.

6.6.15 Given the above, and along with the support from the Design Officer and the QRP, the proposed development in conservation and heritage terms is therefore acceptable.

## **6.7 Design and Appearance**

6.7.1 The NPPF states that *good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities*. Being clear about design expectations, and how these will be tested, is essential for achieving this. The NPPF further states that *proposed developments should be visually attractive, be sympathetic to local character and history, and maintain a strong sense of place*.

6.7.2 Policy SP11 of the Local Plan 2017 requires that *all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use*.

6.7.3 Policy DM6 of the DM DPD 2017 expects all development proposals to include heights of an appropriate scale, responding positively to local context and achieve a high standard of design, which is also in accordance with Policy DM1 of the DM DPD 2017. For buildings projecting above the prevailing height of the surrounding area it will be necessary to justify them in urban design terms, including being of a high design quality.

### *Assessment*

#### *Quality Review Panel (QRP) Comments:*

6.7.4 The Quality Review Panel (QRP) has assessed the scheme in full at planning application stage in July 2025.

6.7.5 The full Quality Review Panel (QRP) report of the review on July 2025 is attached in Appendix 5. The Quality Review Panel's summary of comments is provided below:

*'The Haringey Quality Review Panel warmly welcomes the proposal for affordable housing and workspace, which is thoughtful and comprehensive. The panel encourages the project team to maintain this level of ambition as the scheme develops and suggests some areas for improvement.*

*The fragmented land ownership means that comprehensive redevelopment cannot happen within the timescale of the application. This is not optimal but could be turned into an advantage and lead to a more successful scheme. If the southern and northern corner sites come forward for development, they should offer green relief from the density of neighbourhood, including children's play and bike storage. High level options should be produced to set intentions within this application.*

*The height and massing are comfortable in the context but would be improved by moving the 22-storey tower away from the emerging 27-storey tower on the Alexandra Gate site. The existing mature trees on the site should be retained, and this corner widened for orientation towards Chocolate Factory Square. Options should be tested, subject to the Crossrail 2 tunnel constraints, for moving the height and rebalancing the blocks to achieve a more favourable massing.*

*The quality of the housing proposed is commended. Further thought should be given to how the scheme will create a cohesive vertical community. The chamfered tower corners should have a stronger relationship to each other. A consistent base treatment is recommended, and the junctions between blocks should be resolved. The elevations and materials palette are developing well. Sustainability has been successfully embedded in the design, and the use of external shading is supported.*

*The boulevard of trees along Coburg Road are essential to the public realm. The purpose and design of the colonnade need further work. The podium garden should not be enclosed on all sides in the future. All landscaping should be designed for low maintenance and water management.*

*The lower-level workspace provision is welcome. Flexible design and low rents should be considered to attract tenants and activate the street'*

6.7.6 Following the Quality Review Panel meeting, Officers have met with the applicant to discuss revisions and how best to respond to the QRP comments..

6.7.7 Detailed QRP comments from the July 2025 review together with the officer comments based on the current proposal are set out below:

Panel Comment	Officer Response
Uses and delivery	

<p>The panel commends both Haringey Council and the project team for bringing forward a one hundred per cent affordable housing development.</p> <p>Positive features of the proposal – including climate resilience, number of homes per core, and inset balconies – should be embedded in the drawings and the delivery strategy. The panel also encourages Haringey Council to retain the project team to ensure that the design quality presented is also delivered.</p> <p>The workspaces at ground and first floor levels are a positive way to activate the development and Coburg Road. To find suitable tenants quickly and achieve a vibrant streetscape, the panel recommends designing the units to be as flexible as possible. The council should also consider offering spaces at low or no rents.</p> <p>The range of tenants could be curated with Haringey’s regeneration team to connect to activities in the wider neighbourhood. For example, one space could be an artist’s studio for those contributing to the refurbishment of Penstock Tunnel.</p> <p>Equally, the play space provision may not meet the needs of the anticipated child yield for a scheme of this tenure and density. A freely accessible indoor play space could be provided in one of the ground floor units.</p>	<p>QRP support noted</p> <p>QRP support noted. A project architect retention condition will be secured in order to retain the design quality of the development in the interest of the visual amenity of the area.</p> <p>QRP comment noted. The applicant has confirmed that the space would be delivered to a shell-and-core specification, providing a high degree of flexibility for future occupiers. The scheme has been revised and proposes 539 square metres of flexible workspace, which the applicant sets out would help to ensure that the proposed commercial units would remain viable and occupied.</p> <p>QRP comment noted. The applicant team are currently having discussions with the Council’s regeneration team on the range of tenants</p> <p>QRP comment noted. Playspace is now also proposed on the 6<sup>th</sup> and 8<sup>th</sup> floor wings of the eastern and western building. The shortfall (1,077 square metres) in on-site play space provision arises from the physical constraints of the site and the requirement to accommodate extensive biodiverse green roofs across large areas of the sixth- and eighth-floor roof levels of the western and eastern buildings. These</p>
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	<p>roofs are necessary to meet Urban Greening Factor and biodiversity net gain requirements. Notwithstanding this, Indoor playspace is currently also being proposed by the applicants</p>
<p><b>Site layout and masterplan</b></p> <p>The panel would like to see the tower and massing on the southeastern corner of the site moved westwards to allow more generous public space on the corner of the site and retention of the existing tree. Given the Crossrail 2 constraints, this may require a rebalancing of massing on the site.</p> <p>The existing two-storey buildings on the southern and northern corners are not included in the development. However, they balance the density of the proposal, which builds on almost the entire remaining footprint of the site.</p> <p>As the building heights in the wider site allocation have been increased beyond the intentions of the original masterplan, the undeveloped corners of this site will also offer some relief from this emerging context.</p> <p>The panel understands that the corner sites are not currently within the project team's control but suggests</p>	<p>QRP comment is noted however the rebalancing of the massing on the site is not possible due to the constrained nature of the site associated with the Crossrail 2 tunnel. The applicant's design team has explored alternative layouts to retain the tree; however, due to the constrained nature of the site this is not feasible. Officers consider the public space without the tower/massing moving is acceptable.</p> <p>QRP comment noted.</p> <p>QRP comment noted.</p> <p>As a response to QRP comments the applicant has produced a few high-level indicative masterplan options to confirm that the proposal would not compromise</p>

<p>producing a few high-level options showing how they could best support the scheme and the wider masterplan.</p> <p>In the long-term, if the southern and northern corner sites become available, the panel recommends that they are used for wrap-around, green spaces, rather than developed for more housing.</p> <p>The resident amenity space, particularly children’s play, would be more successful at ground floor level, improving accessibility and surveillance.</p> <p>Raphael House, on the southern corner site, would be a good location for a green open space. This could offer play space and bike storage at ground level. It could also have landscaping linking through Penstock Tunnel to Alexandra Park.</p>	<p>the coordinated development of the remaining land within the site allocation.</p> <p>QRP comment noted.</p> <p>The QRP comment is noted. The provision of ground-level play space has been carefully considered; however, due to the constrained nature of the site, safeguarding requirements associated with the Crossrail 2 tunnel, and the need to accommodate active frontages and servicing at ground level, podium-level amenity space is considered the most appropriate solution. The podium play spaces would be fully accessible, and overlooked by surrounding dwellings to provide passive surveillance.</p> <p>QRP comment noted. The applicants acknowledges that Raphael House presents a potential long-term opportunity, either for a distinctive marker building, or should redevelopment not come forward, for complimentary public realm enhancements such as a small pocket park associated with the Penstock Tunnel installations.</p>
<p><b>Height and massing</b></p> <p>The panel is comfortable with the proposed height and massing, which has been well tested with the emerging townscape cluster of taller buildings.</p>	<p>QRP support noted.</p>

<p>However, the 22-storey tower is very close to the future 27-storey tower on the site immediately to the southeast. Moving it westwards towards the eight storey wing would allow glimpses through to Chocolate Factory Square.</p> <p>The panel understands that the potential future Crossrail 2 tunnel beneath the site is a technical constraint on the location of the tallest block, but asks for further work to be carried out to push this further and safeguard space on the southeastern corner.</p>	<p>QRP comment noted however the massing has been tested extensively and is constrained by the safeguarded Crossrail 2 tunnel. The current tower siting balances townscape impact, daylight considerations, and technical constraints.</p> <p>QRP comment noted however the applicants have set out in the Building Position Justification Report, that the layout and building positions have been strongly influenced by the Crossrail 2 Safeguarding Zone beneath the site, which restricts foundations and limits building loads to the equivalent of 4–6 storeys above the tunnel.</p>
<p><b>Public Realm</b></p> <p>The panel acknowledges that the southern side of Coburg Road is not within the site ownership, but the success of the scheme relies on these street trees. The wider masterplan for the area also establishes Coburg Road as a treelined boulevard, which will be an essential feature of the new neighbourhood.</p> <p>For residents arriving home, the quality of Coburg Road will shape their arrival experience. The public realm should be approached as one coherent space, and the panel asks for assurance that the street trees will be delivered.</p>	<p>QRP comment noted.</p> <p>QRP comment noted. Street trees will be delivered on Coburg Road as part of phase 4 and 5 of the Alexandra Gate development. Street tree planting along the northern side of Coburg Road is not feasible due to the limited footway width on this side of the street. Notwithstanding this constraint, the applicant has agreed to pay a contribution towards new tree planting within a 500m radius of the site as a mitigation solution to compensate its</p>

<p>The junction of Coburg Road and Clarendon Road is an important nexus in the street network, between the new civic spaces of Chocolate Factory Square and Clarendon Square. The panel urges the retention of the existing mature trees on this corner, which provide shade and aid wayfinding.</p> <p>The corner should also be sufficiently generous to lead people towards the new civic spaces and routes onwards. It does not have to be large, but should create a moment for pausing and should aid orientation.</p> <p>The panel is not convinced that the two-storey colonnade at the base of</p>	<p>loss. This will be secured by the director's letter.</p> <p>QRP comment noted. The applicant's design team has explored alternative layouts to retain the existing mature trees; however, the constrained nature of the site, together with the requirements of the Crossrail 2 Safeguarding Zone, has significantly influenced the final layout and design. 11 new trees on the second-floor podium are proposed. As a result, the development would deliver a net increase of 8 trees on the site. Notwithstanding this, to compensate for the loss of the mature trees the applicant has agreed to pay a contribution towards new tree planting within a 500m radius of the site as a mitigation solution to compensate its loss. This will be secured by the director's letter.</p> <p>QRP comment noted, to address this the applicant team has created the activation of Western Road corner to connect with public realm improvements to the tunnel entrance.</p> <p>QRP comment noted however the applicant advises that the colonnades are designed primarily to articulate and accommodate communal residential entrances rather than spill-out public space. Recessed and chamfered entrances provide clear thresholds, activate key corners and maintain residential privacy. Officers consider this approach delivers legible access</p>
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<p>the building fits in with the area. The colonnade is also not deep enough to accommodate spill-out activity, or to act as part of the public pavement. The panel should look at successful precedents, such as those found in Italian cities, to inform the design. A solution for the ground floor treatment, that better addresses the site, is needed.</p> <p>The panel is concerned that the planting proposed under the colonnade will not thrive without an irrigation system, and will need a lot of maintenance. However, there is a need to green the lower levels of the building, particularly if the mature existing trees are removed.</p> <p>The panel suggests providing climbers up the building façades instead of planters under the colonnade. These are more likely to survive and contribute to urban greening, and will save space</p>	<p>and active frontages appropriate to the site and its constraints.</p> <p>QRP comment noted, to address this the planting has now been removed from under the colonnade and the greening is incorporated into the ground floor dwellings in the form of raised planters providing defensible space, providing on-street greening.</p> <p>QRP comment noted, the suggestion to incorporate climbers on the building façades was explored by the project team; however, this approach was not considered feasible. The proposed façades incorporate a high proportion of windows and inset balconies which limit suitable continuous wall surfaces for climber planting. In addition, the building height, exposure, long-term maintenance requirements and potential risks to the building fabric were considered to make façade climbers impractical and unreliable in this location. Instead, greening has been successfully integrated through extensive green roofs, podium landscaping and tree planting, which provide a more robust, maintainable and effective contribution to urban greening and biodiversity objectives.</p> <p>QRP comment noted, to address this the details of the raised planters integrated into the maisonettes will be secured by condition.</p>
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<p>The maisonettes with individual front doors and landscaping onto New Street are welcome. The project team should design realistic front gardens, embedding low maintenance, deliverable green space into the scheme so that it will not be removed in value engineering processes, and will contribute to the character of New Street</p>	
<p><b>Podium garden</b></p> <p>The project team has achieved a podium garden that meets the required amenity and play space quantity for a dense development. However, the quality should be improved during the next design stage, particularly as it is the only amenity provision on the site.</p> <p>The panel asks that the views from the podium garden over the future Chocolate Factory Square, and the wider views to Alexandra Palace and Park, are safeguarded, even if the corner sites are redeveloped in the long-term.</p> <p>If these corner sites are developed beyond two storeys, the podium</p>	<p>QRP comment noted, the details of the amenity provision on the podium gardens will be secured by the landscaping condition.</p> <p>QRP comment noted. The applicant has shown in their landscape design that views from the podium garden over the future Chocolate Factory Square, and the wider views to Alexandra Palace and Park, are safeguarded The applicants have also shown in their master plan that if both corner sites were developed these views can still be safeguarded</p> <p>QRP comment noted. The podium is kept as open as possible which</p>

<p>garden will be enclosed on all sides. This is likely to cause issues with overshadowing and acoustics, making the garden less usable and preventing residents from opening their windows. The podium should be kept as open as possible.</p> <p>The internal access to the podium garden involves long and narrow corridors. This should be simplified. The lobbies by the garden entrances should also be more generous to create a sense of arrival for residents.</p> <p>The project team should check that the podium garden space and all resident balconies will be usable, given the overshadowing likely from the future 27- storey tower immediately to the south on the Alexandra Gate site.</p> <p>A significant irrigation system and sufficient loading would need to be integrated into the podium garden design for it to achieve the project team's verdant vision, which includes grass and trees. Given the cost implications, combined with climate change, there is a danger that this approach will fail and be replaced by artificial grass or similar.</p> <p>The panel recommends instead designing low-maintenance landscaping from the outset that does not require high water consumption.</p>	<p>enables the podium garden to be more usable.</p> <p>QRP comment noted. To address this, the layout has been refined to ensure the length of corridors and distance from both cores to external access to the podium is very short and direct.</p> <p>QRP comment noted. The applicant has demonstrated that the podium garden space and all resident balconies will be usable.</p> <p>QRP comment noted. The applicant has demonstrated through the indicative masterplan that any future development of the corner sites would still allow daylight penetration to the podium garden and maintain outward views.</p> <p>QRP comment noted. The details of the irrigation system and loading integrated into the podium garden will be secured by the landscaping condition.</p> <p>QRP comment noted. To address this the applicant has submitted a detailed landscape planting schedule. The</p>
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<p>This can still create an attractive and usable garden, and will be more climate resilient too</p> <p>The maintenance of landscaping is fundamental to the scheme's success. The panel asks Haringey Council and the project team to put a management plan in place, including a process to procure high-quality landscape contractors</p>	<p>details of the landscaping will be secured by condition.</p> <p>QRP comment noted. The details of the landscaping management scheme will be secured by condition.</p>
<p><b>Housing</b></p> <p>The panel supports the proposed number of homes per floor and per core in the towers and is pleased to see inset balconies provided. Both measures help to create higher-quality, more liveable homes</p> <p>It is also positive that the maisonettes have their own front doors, and that deck access is proposed for part of the</p>	<p>QRP support noted.</p> <p>QRP comment noted however it is only feasible to provide the deck access at</p>

<p>scheme. These design choices foster a sense of home and neighbourliness. The project team should explore whether deck access can be applied to other parts of the development too.</p> <p>The panel asks that the physical, social and psychological aspects of tall and dense housing are investigated. The design should nurture a strong vertical community, focusing particularly on thresholds and meeting points, such as entrance lobbies and lifts.</p> <p>The panel also suggests engaging with the project teams of the recently completed Clarendon Gasworks masterplan immediately to the south, and learning from their post-occupancy evaluation</p>	<p>the lower levels within the wings as there are only four homes per floor to each tower and each home is on a corner of the tower and therefore dual aspect.</p> <p>The tower elements do not lend themselves to deck access due to their height and configuration</p> <p>As a response to QRP comments the scheme includes a communal entrance of the eastern building positioned in front of the workspace that is recessed, to foster a communal atmosphere with integrated seating, encouraging interaction and rest stops. Communal entrances are strategically placed within the colonnades to create a clear presence on the street. The core entrance is placed in the corner, clearly visible, generous and welcoming.</p> <p>As a response to QRP comments the applicant team has confirmed that they engaged with the project teams of the Alexandra Gate development (formerly Clarendon Square) at the pre-application stage .</p>
<p><b>Architecture and materiality</b></p> <p>The chamfered corners of the two tower blocks result from the technical loading constraints of the potential Crossrail 2 tunnel. However, they contribute to the character of the scheme.</p>	<p>QRP comment noted.</p>

<p>To establish a more intentional relationship, the panel recommends that the chamfers should face each other across the podium garden. The chamfer on the 14-storey tower should also be more pronounced, and more legible from ground level.</p> <p>The project team should develop a consistent treatment to the two-storey base, potentially exploring wrapping the colonnade around all sides of the building, or developing a more appropriate solution for the site</p> <p>Further work is needed to resolve the junction between the 22-storey tower and the eight-storey wing. The panel suggests finding a simple solution, perhaps with the tower extending to meet the ground.</p> <p>The elevations are developing well, but the panel asks for the emphasis either on horizontality or verticality to be clarified.</p> <p>The materials and colour palettes selected are a successful combination. It will be important to select a robust, attractive brick that</p>	<p>QRP comment noted however Officers consider that although the chamfers would not face each other along the podium garden, the design of the chamfers and their relationship is acceptable, and they would be visible from each other</p> <p>The design of the colonnade was amended in response to QRP comments to make it consistent and to wrap around the corner to extend along the whole length of both the Coburg Road and Clarendon Road frontages of the application site.</p> <p>QRP comment noted, to address this the design has been refined so that the edge of the recessed loggia in the shoulder block aligns precisely with the edge of the recessed corner balconies of the tower. In addition, the vertical banding on the tower has been calibrated to match the rhythm of the banding on the lower floors, ensuring a coherent and elegant architectural relationship between the two elements.</p> <p>QRP comment noted. The Design Officer notes that a rhythm of expressed vertical and horizontal banding break up the facades and relate back to the urban context, in particular picking up on the designs of neighbouring industrial buildings such as the Chocolate Factory.</p> <p>QRP comments noted. Details of the material and colour palettes will be secured by condition.</p>
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<p>works with the proposed tones and textures.</p> <p>The rooftop designs should be developed, considering parapets or screening for any protruding plant equipment, photovoltaic panels or lift overruns.</p>	<p>QRP comments noted, to address this the rooftop design will include parapets to screen protruding plant equipment, photovoltaic panels or lift overruns</p>
<p><b>Sustainability</b></p> <p>Sustainability has informed design decisions, and has been successfully embedded. This dialogue should be maintained as the scheme develops</p> <p>The panel supports the use of external blinds or shutters to mitigate overheating. The project team should investigate how successful this strategy has been on recently delivered schemes, such as the BBC Television Centre affordable housing development by Maccreanor Lavington</p> <p>Further thinking is required about water management. Considering the extent of hard-standing, both in the current and emerging contexts, the</p>	<p>QRP support noted. Regular sustainability workshops have informed the design development of the scheme.</p> <p>QRP support noted. As a response to QRP comments the applicant team has demonstrated within the Design and Access Statement how they have explored the affordable housing development by Maccreanor Lavington The Design Officers notes that the roller shutters proposed will feature a checkerboard pattern consistent with the wider architectural language, avoiding the blank, utilitarian appearance often associated with such systems. Their mechanisms and housings will be fully concealed within the depth of the lintel, ensuring a clean and refined façade.</p> <p>QRP comment noted. In regards to water run-off. The Lead Local Flood Authority does not object to the proposed development subject to the imposition of conditions</p>

landscape proposals should be developed to mitigate water run-off.	
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6.7.8 As set out above, the applicant has sought to engage with, and positively respond to, the QRP. The panel had expressed that they would welcome an opportunity to comment on the scheme again, once the design had progressed in consultation with planning officers. However, Officers are confident that the scheme has progressed positively and QRP comments addressed to an appropriate extent without the need to return for another design review.

*Assessment*

*Form, Bulk and Massing*

6.7.9 The proposals comprise two principal blocks that would deliver the majority of a potential enclosed perimeter block on this modest-sized urban site. The two corner plots lie outside the applicant's ownership, but they offer clear future infill opportunities that could complete the block in a coherent and well-integrated manner. The scheme has been designed with blank party walls at the ends of the two deck-access shoulder wings, positioned directly on the boundaries with the corner plots to facilitate this future development potential. At the same time, the scheme intentionally retains a 'half-gap' between the taller elements and the corner boundaries, ensuring appropriate access, maintaining permeability, and preventing an overly enclosed block form.

6.7.10 The height and bulk of the individual elements are deliberately calibrated to their immediate street context, both in the towers and in the shoulder wings. This is expressed most clearly in the tallest tower marking the primary crossroads at Coburg Road and Clarendon Road, while the secondary junction of Western Road and the new east-west street is appropriately signalled by a shorter tower. The southern shoulder wing presents eight storeys to Coburg Road, whereas the northern shoulder wing steps down to six storeys along the new east-west street, reflecting its more modest, residential character.

6.7.11 This contextual response is further reinforced through the architectural treatment of the base. The taller tower and its associated wing, located on the major east-west and north-south routes, incorporate a two-storey arcaded base, providing a strong civic presence. In contrast, the Western Road frontage and the corner turning into the new street adopt a single-storey base, consistent with the reduced scale of these streets.

6.7.12 Along the new east–west street, the residential frontage intentionally inverts this hierarchy. Here, there is no architectural base; instead, the building is grounded through a robust masonry frontage and front gardens serving three-storey maisonettes, with three levels of deck-access flats above. This creates an appropriately domestic scale and character for this quieter residential street.

#### Urban Form and Streetscape

6.7.13 The extent of active frontage delivered by the proposal is particularly strong. The scheme fronts onto Coburg Road, identified as the principal east–west town-centre and civic ‘high street’ within the Heartlands Growth Area, and onto Clarendon Road, the main north–south pedestrian-priority street linking the two emerging urban squares—Chocolate Square and Alexandra Gate—both of which are approved in detail and partially constructed.

6.7.14 The entirety of these two key frontages is articulated as a columned, two-storey arcade. This incorporates predominantly clear-glazed ‘shopfront’ elevations to two substantial ground-floor workspace units, the generously sized main residential lobby, and a further lobby serving the first-floor workspace. Only a small proportion of the ground-floor frontage is occupied by essential plant (including an electricity substation) and refuse access. The first floor of the arcade will be fully glazed to the business units above. The arcade design is expected to be generous, uncluttered and robust, with high-quality metallic detailing to the columns and architectural elements.

6.7.15 At the north-western corner, where the scheme fronts Western Road and turns into the new east–west street, the proposal comprises an additional commercial unit on Western Road and a prominent residential entrance on the corner. This frontage is expressed as a single-storey base—appropriate to the reduced height at this point—while still maintaining a strong architectural presence. Although this section does not continue the full arcade, the materials and detailing will match the two-storey arcade on the busier southern and eastern elevations.

6.7.16 Behind the residential core entrance, a short stretch of single-storey utilitarian façade is unavoidable to accommodate refuse stores and means of escape. This then transitions into a row of three-storey maisonettes with individual front doors and windows at ground level, mirroring the approved and constructed maisonettes opposite. These homes introduce a quieter residential character to the new street, with angled entrance recesses, ground-floor kitchen-dining windows providing passive surveillance and raised front-garden planters contributing to a domestic scale.

6.7.17 The central part of the development is formed by a two-storey podium, set back from the street frontages. This provides an efficient location for ‘back-of-house’ functions, including extensive ground-floor plant and significant cycle-storage provision at first floor. Two controlled service routes—one narrow access path

north of the taller tower from Clarendon Road, and a wider access route south of the lower tower from Western Road—provide, respectively, fire-escape and maintenance access, and covered access for cycle parking (via a dedicated cycle lift) and servicing.

6.7.18 Taken together, these elements ensure that active, engaging street frontages are achieved throughout the development, calibrated to the character and function of each street. Ground-level landscaping is intentionally modest along the busier frontages, while the more residential New Street benefits from a softer landscape treatment. The scheme will also benefit from the widened pavements and new street trees delivered as part of the Alexandra Gate development on the south side of Coburg Road, alongside the existing mature trees lining Western Road.

#### *Elevational Composition, Fenestration and Balconies*

6.7.19 The street-facing elevations of all blocks have been carefully composed to be well-proportioned, attractive and visually engaging. Each block incorporates a clearly defined base, scaled appropriately to its overall height, grounding the buildings within their busy street settings. Above this, the elevations transition into a distinct residential middle, with each tower culminating in a well-articulated “crown” at the top floor. A deliberate rhythm of vertical and horizontal banding breaks up the façades and anchors the architecture within its urban context, drawing particular reference from neighbouring industrial buildings such as the Chocolate Factory.

6.7.20 Within this overarching architectural language, contextual variation is introduced. The taller tower and its associated shoulder block, addressing the more prominent frontages to Coburg Road and Clarendon Road, feature stronger vertical banding. In contrast, the Western Road frontage and the new east–west street adopt a more horizontal emphasis. Private balconies are inset at the tower corners, set behind deep loggias whose columns extend the arcade rhythm along the Coburg Road shoulder. On the northern shoulder, the podium incorporates an open framework of three storeys of communal access decks on the north side, contrasting with the more robust masonry expression of the three-storey maisonettes below.

6.7.21 The podium elevations, at four and six storeys, adopt a more domestic character, designed to encourage community interaction between balconies, access decks and shared open spaces. As the towers rise above their shoulders, they become true 360-degree buildings, with a consistent architectural expression to all sides, reflecting their wider visibility within the townscape. The end façades of the shoulder blocks—designed to allow for potential future development on the adjacent corner plots—are intentionally plain but relieved with a checkerboard brick pattern, ensuring they remain visually acceptable for as long as the neighbouring sites remain undeveloped.

6.7.22 Window and balcony treatments vary according to whether the façade has a vertical or horizontal emphasis or is internal to the podium. On vertically emphasised elevations, windows are generally floor-to-ceiling and divided into two or three panes, with Juliet balconies where required. Full-depth balconies incorporate painted metal balustrades that complement the window framing and other contrasting elements, contributing to a strong vertical composition and a sense of civic presence while ensuring generous daylight and a human scale. On horizontally emphasised façades, the banding forms brick balcony balustrades with a metal handrail, and windows are wider and shallower, typically in three panes. Across all façades, windows are framed by deep contrasting lintels designed to accommodate integrated solar shading.

#### *Materials and Detailing*

6.7.23 The materials palette is deliberately bold yet simple, chosen to reinforce the elevational composition, ensure long-term durability and deliver an attractive, civic-scaled architectural character. The primary materials comprise a white/light-grey brick and a contrasting deep green tone expressed through glass-reinforced concrete (GRC), metalwork and glazed brick. This green materiality is consistently deployed at the base of the buildings—within the two-storey colonnade, the single-storey base, the maisonette ground-floor elements, and all doors, windows, metal balconies and balustrades, as well as the crown features of the taller tower.

6.7.24 The brickwork, mortar and pointing will use two closely related bricks: a 'white and a 'white, with grey accents'. These are sufficiently distinct to articulate subtle variations in vertical and horizontal banding, checkerboard patterns and other façade detailing. Warm buff-coloured mortar is proposed to introduce a degree of warmth to what could otherwise be a cooler palette. Overall, the light grey brick tones will complement the emerging civic character of the Coburg Road area, consistent with the material approach approved for the neighbouring Alexandra Gate. The detailed physical samples of the brickwork, mortar and pointing will be secured by condition.

6.7.25 The proposed glass-reinforced concrete GRC would provide a robust and visually striking base, particularly suited to high-traffic and hard-working areas. Accents of glazed brick will add richness and visual depth, catching sunlight and artificial light to create a subtle sparkle within the public realm. Matching green metalwork will continue this theme across the more brick-dominated upper levels and into the crown of the taller tower, while the lower tower adopts a similar but more restrained brick-based crown.

6.7.26 Deep green metal lintels to residential windows and patio doors are designed to incorporate integrated sunscreens, ensuring that overheating mitigation is embedded from the outset where required—primarily on eastern, southern and western elevations. The roller shutters themselves would feature a checkerboard

pattern consistent with the wider architectural language, avoiding the blank, utilitarian appearance often associated with such systems. Their mechanisms and housings will be fully concealed within the depth of the lintel, ensuring a clean and refined façade.

### Design Summary

6.7.27 The overall form, bulk and massing of the scheme would coherently support the wider neighbourhood transformation and successfully prioritise the most important streets within a well-executed perimeter-block layout. In urban-form and streetscape terms, the proposals deliver an exceptionally high level of active frontage, while discreetly and efficiently accommodating all necessary back-of-house functions.

6.7.28 The elevational composition is particularly strong, with a well-judged rhythm of banding and a clear gradation from base to middle to top. Fenestration and balcony design provide high-quality living conditions, incorporating effective screening to address solar gain and privacy. The proposed materials and detailing are of a high standard—coherent, robust and durable—and align convincingly with the emerging civic character of the Coburg Road core of the Heartlands area.

## **6.8 Residential Quality**

### *General Layout, Indoor and outdoor space/accommodation standards*

6.8.1 The mixed-use development is to be arranged across the eastern building, western building and podium building, with frontages addressing Coburg Road, Western Road, New Street and Clarendon Road. The ground floor comprises four maisonettes accessed directly from New Street and arranged across the ground, first and second floors, alongside two residential core entrances serving the upper-floor dwellings. The ground floor also accommodates separate residential and commercial refuse stores, commercial cycle storage, three flexible commercial units, and associated plant and service rooms.

6.8.2 At first floor level, the development would provide three residential dwellings, six residential cycle stores (including one accessible cycle store), four flexible commercial units, a commercial workspace breakout area, and additional service rooms.

6.8.3 The layout of the upper floors are designed to maximise amenity whilst promoting neighbourliness, with no more than six dwellings per floor within the wings and no more than four dwellings per floor within the towers. Dwellings at the lower levels are accessed via a communal deck.

6.8.4 A communal podium at second floor level includes dedicated play space for children aged 0–4 years. Further communal podiums and terraces are to be provided at sixth and eighth floor levels, each incorporating play space for children

aged 5–11 years. The sixth and eighth floors also incorporate extensive green roofs. Mechanical plant and photovoltaic arrays are located at roof level on the towers.

6.8.5 Twelve blue Badge parking bays are to be provided on the adjacent public highway directly fronting the site, as set out below;

- 5 x bays on New Street
- 2 bays in the Chocolate Factory Phase 1 Block E2 Car Park
- 4 bays on Clarendon Road
- 1 bay on Western Road

6.8.6 The Nationally Described Space Standards set out the minimum space requirements for new housing. The London Plan 2021 standards are consistent with these. Policy D6 of the London Plan 2021 requires housing developments to be of high-quality design, providing comfortable and functional layouts, benefiting from sufficient daylight and sunlight, maximising the provision of dual aspect units and providing adequate and easily accessible outdoor amenity space. It provides qualitative design aspects that should be addressed in housing developments.

6.8.7 The Mayor of London's Housing SPG seeks to ensure that the layout and design of residential and mixed-use development should ensure a coherent, legible, inclusive and secure environment is achieved.

6.8.8 All proposed dwellings would exceed minimum space standards including bedroom sizes, complying with policy.

6.8.9 All dwellings would be provided with private amenity space in the form of south or west facing balconies, with the four-bedroom ground-floor dwellings additionally benefiting from private rear gardens. This provision and size of the private amenity space meets the requirements of the Mayor's Housing Supplementary Planning Guidance (SPG). All new homes would also have access to shared communal podium courtyards and terraces at second, sixth and eighth floor levels, which incorporate dedicated children's play space. In addition, residents would benefit from the proximity of a number of nearby public parks, providing further opportunities for informal recreation and outdoor amenity.

6.8.10 All dwellings would have a minimum floor to ceiling height of 2.5 metres and considerable care has been taken in the layout of dwellings within the buildings with the ground floor four bed maisonettes, accessed directly from New Street set back from the walkway above for enhanced privacy. Entrances to and circulation within blocks is spacious and benefits from external windows providing a decent amount of natural light to some upper floor corridors. Each core has a prominently located street entrance, in highly legible and active locations, a fully glazed entrance hall, in attractive, durable materials, opening directly off the public street,

leading through relatively short corridors to double stairs and double lifts. Each building would feature no more than 6 homes per floor in the wings, and no more than four homes per floor within the towers with a lift serving each of the floors. Dwellings at the lower levels would be accessed via a communal deck, which provides shared circulation space. All dwellings would be well laid out to provide useable living spaces and sufficient internal storage space. The homes are considered to be acceptable in this regard.

6.8.11 All dwellings have been carefully designed to be dual or triple aspect, with only one dwelling (0.6%) proposed to be single aspect (north facing) whilst preserving privacy to the existing neighbours. This is considered to constitute high quality accommodation.

#### *Accessible Housing*

6.12 Policy D7 of the London Plan 2021 seeks to provide suitable housing and genuine choice for London's diverse population, including people with disabilities, older people and families with young children. To achieve this, it requires that 10% of new housing is wheelchair accessible and that the remaining 90% is easily adaptable for residents if/when needs arise. Policy SP2 of the Local Plan 2017 is consistent with this, as is Policy DM2 of the DM DPD 2017 which requires new developments to be designed so that they can be used safely, easily and with dignity by all.

6.8.13 All dwellings would be designed to comply with Building Regulations M4 (2), with 10% of the development meeting M4(3) wheelchair accessible standards. The wheelchair accessible homes would be both two and three bed homes and located at second, third, fourth, fifth, sixth and seventh floor levels within the eastern building, and at third, fourth and fifth floor levels within the western building; providing variety to the size and location of these homes.

6.8.14 Both the eastern and western building provides step free access throughout and would incorporate a passenger lift suitable for a wheelchair user. Twelve Blue Badge parking bays are to be provided to serve the development. This will be discussed further in the transport and parking section of the report.

#### *Child Play Space provision*

6.8.15 Policy S4 of the London Plan 2021 seeks to ensure that development proposals include suitable provision for play and recreation. Policy SP2 of the Local Plan 2017 requires residential development proposals to adopt the GLA Child Play Space Standards and Policy SP13 of the Local Plan 2017 underlines the need to make provision for children's informal or formal play space.

6.8.16 The child yield for the proposed development has been calculated in accordance with the current Greater London Authority (GLA) Population Yield Calculator, having regard to the proposed unit mix and tenure. This identifies a total child yield

of 138.7 children, resulting in a policy-compliant play space requirement of 1,387 square metres across all age groups.

6.8.17 The proposed development would provide a total of 310 square metres of on-site dedicated children's play space, resulting in an overall shortfall of 1,029 square metres when assessed against policy requirements. The shortfall in play space provision is broken down as follows:

- 0–4 years: 197 sqm provided (shortfall of 399 sqm)
- 5–11 years: 80 sqm provided (shortfall of 381 sqm)
- 12–15 years: 0 sqm provided (shortfall of 216 sqm)
- 16–17 years: 33 sqm provided (shortfall of 33 sqm)

6.8.18 The shortfall in on-site play space provision arises from the physical constraints of the site and the requirement to accommodate extensive biodiverse green roofs across large areas of the sixth and eighth floor roof levels of the western and eastern buildings. These roofs are necessary to meet Urban Greening Factor and biodiversity net gain requirements. However, the 4 bed maisonettes would benefit from a private rear garden and the upper floor family dwellings would benefit from usable private balconies.

6.8.19 Notwithstanding the on-site shortfall, the site benefits from close proximity to a range of existing parks and open spaces. Hornsey Park which provides an octagonal tower built on a mound providing climbing and exploration through height is located approximately 340 metres from the site, Wood Green Common which has a recently installed new play area is approximately 500 metres from the site, Alexandra Park which provide a large play area is approximately 950 metres from the site, and other larger play facilities within New River Village are also within walking distance. Penstock Tunnel in close proximity to the site is currently being upgraded and will provide playable landscape. These facilities fall within the recommended catchment distances set out in the Mayor's Play and Recreation Supplementary Planning Guidance and cater for all age groups.

6.8.21 Although it is considered, in what is an urban area, a not insignificant level of amenity / play space secured for the proposal, and which would also benefit from existing surrounding amenity / playspace space, there is a shortfall. In order to mitigate this, the applicant has agreed to make a financial contribution of £131,765 towards off-site play provision in accordance with paragraph 9.20 of the Planning Obligations SPD (2018). The financial contribution would be put towards off-site provision, including the creation of new children play spaces or improvements to existing provision, it is within 200 metres of the development site and where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents, This will be secured by a Directors' agreement letter. Notwithstanding this, the applicant will also be

providing an indoor community play area within the commercial floor space proposed to meet the needs of existing and future residents. The details of the indoor community playspace can be secured by condition.

#### *Outlook and Privacy*

6.8.22 The layout and orientation of the buildings would ensure that the majority of dwellings benefit from an open aspect over surrounding streets, podium spaces or wider townscape views. The arrangement of the towers, wings and podium elements avoids excessive enclosure, with stepped massing and building separation helping to maintain a good outlook for residents, particularly within the lower-level dwellings, whilst also allowing passive surveillance and animation to the playspace at the podium levels.

6.8.23 Establishing an acceptable level of privacy between dwellings has been carefully considered. Appropriate separation distances would be maintained between facing habitable room windows, and the location and orientation of balconies have been designed to minimise direct overlooking. All balconies are either west or south facing, directing outlook away from neighbouring residential buildings to ensure a degree of privacy.

There are a small number of locations where some degree of privacy sensitivity may arise in relation to communal circulation and amenity areas, particularly for homes facing the podium garden, access decks and roof terraces. The flats and maisonettes on the north side of the podium have their living room spaces with lower privacy sensitivity set behind short private roof terraces, which residents can use to enhance privacy if desired. There is one bedroom overlooking the sixth-floor roof terrace, and a living room and kitchen overlooking the eighth-floor terrace, but all of these are proposed to be screened by raised planting beds.

6.8.24 The maisonettes would benefit from clearly defined private rear gardens with defensible space, providing a degree of separation from shared circulation areas and the public realm.

6.8.25 As such, it is considered that appropriate levels of outlook and privacy would be achieved within the proposed development for the proposed residential homes.

#### *Daylight/sunlight/overshadowing*

6.8.26 Daylight and sunlight levels within the proposed residential accommodation would generally meet the BRE Guidelines, which represents a strong outcome for a high-density scheme. For daylight, 336 of the 447 habitable rooms (75%) would achieve or exceed the recommended levels. The majority of rooms seeing lower daylight levels than recommended (61 out of 111) are bedrooms, which, in general, have a lower expectation of daylight than living areas. The remaining 50 rooms are split as follows: 11 kitchens, 8 living rooms and 31 combined living/ kitchen/dining rooms.—typically occur in homes where windows sit behind balconies with further

balconies above, a configuration that nonetheless provides valuable private outdoor space. Overall, given the density and urban context, the daylight performance is considered good.

6.8.27 For sunlight, 81% of homes (122 of 150) would contain habitable rooms facing within 90° of due south, and 61% (92 homes) would have at least one room receiving the BRE-recommended 1.5 hours of sunlight, with 70 units meeting the full guideline. While this performance is less strong than the daylight results, it is considered acceptable for a high-rise, high-density development in its surrounding context.

6.8.28 All three communal amenity spaces would exceed the BRE recommendation of at least two hours of sunlight at the solstice. The podium and northern roof terrace would each receive around 3.5 hours, while the southern roof terrace would benefit from an exceptional six hours. This demonstrates that, even where individual flats may not achieve full sunlight compliance, residents would have access to well-sunlit communal outdoor spaces. The podium results in particular address earlier officer and QRP concerns and indicate capacity to accommodate future development on the corner plots while retaining acceptable sunlight levels. All homes also benefit from a private balcony or terrace, most of which would receive more than the recommended sunlight.

6.8.29 It is widely recognised that residents place greater value on sunlight to their amenity spaces than to their living rooms, appreciating the ability to sit outdoors in the sun and to enjoy views from living spaces onto sunny external areas. Excessive sunlight into living rooms can also contribute to overheating and reduce comfort. Given that all residents would have access to sunny communal spaces, most would have sunny private amenity space, and a reasonable proportion would receive sunlight to their living rooms, the overall sunlight provision is considered acceptable on this occasion.

#### *Other Amenity Considerations*

##### *Air Quality*

6.8.30 Part A of Policy DM23 of the DM DPD 2017 requires all development to consider air quality and to improve or mitigate the impact on air quality in the borough and for users of proposed development.

6.8.31 The Pollution Officer is satisfied that future occupants would experience acceptable air quality with pollutant concentrations below the air quality objectives. The Council's Lead Pollution Officer raises no objection to the proposal subject to the relevant condition being imposed in respect of management and control of dust. (This is covered in more detail under paragraph 6.13 of the report).

- . The Council's Lead Pollution Officer raises no objection to the proposal subject to the relevant condition being imposed in respect of management and control of dust

### *Noise*

6.8.32 Part E of Policy DM23 of the DM DPD 2017 states that a noise assessment will be required to be submitted if the proposed development is a noise sensitive development, or an activity with the potential to generate noise.

6.8.33 The applicant's Noise Impact Assessment sets out sound insulation requirements to ensure that the internal noise environment of the accommodation meets the relevant standards and recommends that the air source heat pumps, as well as mechanical ventilation with heat recovery units (MVHR) proposed are enclosed in a solid barrier with an absorptive inner face, extending 1m above the tops of the air source heat pumps, to suitably control plant noise emissions. This would be secured by a condition.

### Lighting

6.8.34 Policy DM23 of the DM DPD 2017 seeks to ensure that development proposals that include external lighting must mitigate potential adverse impacts from such lighting.

6.8.35 Lighting throughout the site is proposed, details of which will be submitted as required through the imposition a condition so to ensure that the scheme is adequately lit for safety reasons, whilst ensuring that there is no material adverse impacts on future occupiers of the development and neighbours.

### *Waste*

6.8.36 Policy DM4 of the DM DPD 2017 seeks to ensure that all proposals make on-site provision for general waste.

6.8.37 The communal waste stores serving the residential units are to be located within both the eastern and western buildings. Refuse collection for the eastern building would be undertaken from Coburg Road, with collections taking place on-street and designed to be integrated into, and safeguarded as part of, future public realm improvements along Coburg Road. Refuse collection for the western building will be carried out from the proposed inset loading bay on New Street. In both cases, the distance between the waste stores and the collection points is within 10 metres, in accordance with operational requirements.

6.8.38 The applicant has agreed to providing details of a finalised operational waste management strategy confirming weekly residential refuse collection for the communal system, management responsibilities, and monitoring arrangements; detailed bin store layouts and access drawings demonstrating safe operation and compliance with the Council access standards; and a Commercial Waste Management Plan. The Council's Waste Management Officer is satisfied these matters can be adequately addressed at a later stage, and as such can be secured by the imposition of a condition.

6.8.39 The applicant has confirmed that refuse collection for the commercial element will be organised via a private contractor or the Council's contractor depending on the end user.

### *Security*

6.8.40 Secure by Design principles have been embedded into the layout and design of the development and have been informed by engagement with the Designing Out Crime Officer. The scheme promotes natural surveillance through active ground-floor frontages, clearly visible and legible entrances, and maisonettes with individual front doors addressing the street. Residential cores are designed to be transparent where possible and easily identifiable from the public realm.

6.8.41 Access to residential areas is to be controlled through secure entry systems, with doors, windows and balcony access doors designed to meet PAS 24 standards of the British Standards Institution. Communal areas, including podium spaces, cycle storage and refuse stores, would be securely located, well-lit and overlooked. External lighting would be designed in accordance with CIBSE and Secure by Design guidance, and public and private spaces are proposed as clearly defined, to provide defensible space and contribute to a safe and secure living environment.

6.8.42 The Secured by Design Officer does not object to the proposed development subject to conditions being imposed on any grant of planning consent requiring details of and compliance with the principles and practices of the Secured by Design Award Scheme. It is also recommended that a condition be imposed requiring provision and approval of lighting details in the interests of security.

## **6.9 Impact on Neighbouring Amenity**

- 6.9.1 Policy D6 of the London Plan 2021 outlines that design must not be detrimental to the amenity of surrounding housing, specifically stating that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. Policy D14 of the London Plan 2021 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.9.2 Policy DM1 ‘Delivering High Quality Design’ of the DM DPD 2017 states that development proposals must ensure a high standard of privacy and amenity for a development’s users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid overlooking and loss of privacy and detriment to amenity of neighbouring residents.

*Daylight and Sunlight Impact*

- 6.9.3 The applicant’s consultants have undertaken a detailed and methodologically robust assessment of the proposal’s daylight and sunlight impacts on neighbouring homes. This includes the existing dwellings in Nilgun Canver Court (the completed residential element of the Chocolate Factory Phase 1 permission, the unbuilt remainder of that block (Block E1), the converted and extended flats in Parma House currently under construction, the permitted Phase 4 (Blocks H1-H3) of the Alexandra Gate development, and the emerging proposals for Phase 5 (Blocks G, H and J). The latter has been informed by collaborative workshops between the applicant and neighbouring design teams to minimise mutual impacts between the two schemes.
- 6.9.4 A key complexity in the assessment is the definition of an appropriate baseline. It would not be reasonable, nor consistent with the BRE Guide, to compare the proposals solely against the existing low-density industrial buildings and cleared sites that currently occupy parts of both this site and its neighbours. Instead, the extant and partially implemented Chocolate Factory Phase 1 extant permission which includes Block E1 and Block D forms part of the baseline for assessing effects on Nilgun Canver Court (formerly Block E2).
- 6.9.5 The applicant’s consultants also reference called-in and appeal decisions that refine expectations for acceptable daylight levels in dense urban regeneration areas, which have accepted VSC levels in the ‘mid-teens’ and recognise an absolute VSC loss of 3% as a threshold of perceptibility. Although these decisions pre-date the latest BRE revisions, their principles are largely incorporated into current guidance. The Mayor of London’s Housing SPG and the GLA Housing SPD similarly acknowledge that the 27% VSC guideline is based on low-density suburban conditions, and that VSC values above 20% are good in an urban context, with mid-teen values often acceptable.

- 6.9.6 The applicant's assessment indicates that the permitted but unbuilt Block E1 would experience a number of daylight and sunlight shortfalls against the BRE guidelines. For daylight, 41 of 67 windows would fall below the Vertical Sky Component guideline, although most would retain levels considered reasonable in a high-density urban context, with only a small proportion marginally below the adjusted target. Fourteen of 42 rooms would fall short of the No Sky Line measure. For sunlight, 32 of 63 relevant windows would not meet the BRE guideline, including a proportion serving bedrooms and kitchens where sunlight is less critical. These impacts must be considered in the context of a planned high-density town-centre environment, where reduced levels of daylight and sunlight are anticipated, and where Block E1 will front an active, well-lit public square. As Block E1 has not yet been constructed or occupied, no existing residents would be affected.
- 6.9.7 Overshadowing of the existing podium garden shared between Blocks E1 and E2 is already below BRE recommendations under Phase 1 of the Chocolate Factory extant permission. The proposals would not materially worsen this position, and the garden would continue to receive good sunlight during the summer months (April to August). The proposed roof terrace on Block E1 and the 'Chocolate Square' public open space would both continue to receive excellent sunlight levels. A small reduction in sunlight to solar panels on a lower roof of Nilgun Canver Court is identified, but this is assessed as marginal relative to the baseline.
- 6.9.8 At the Alexandra Gate development to the south, only impact on daylight is relevant, given the existing and proposed buildings' locations relative to one another. For Phase 4 (permitted but unbuilt), the majority of windows remain unaffected, with only 29 of 592 windows falling below BRE recommendations. These are generally dual-aspect living rooms close to the boundary, where overall daylight would remain good. For Phase 5, the assessment identifies areas where achieving acceptable daylight may be more challenging but indicates that appropriate design measures—such as larger windows and careful balcony detailing - should enable compliance at detailed design stage.
- 6.9.9 The BRE Guide emphasises that its standards are based on low-density suburban development and should not be rigidly applied to dense urban locations. GLA guidance reinforces this position. In this context, the daylight and sunlight performance of the proposed development—both within the scheme and in relation to neighbouring existing, permitted and emerging developments—is considered good for a high-density, tall-building scheme and location. The proposals would achieve an appropriate balance between optimising development capacity and maintaining acceptable levels of residential amenity.
- 6.9.10 Overall, the proposal is considered to have an acceptable impact on daylight and sunlight and is not considered to have a material adverse impact on surrounding residents and occupiers.

*Privacy/Overlooking and outlook*

6.9.11 The proposed development effectively forms a complete city block, aside from the two small corner plots, and therefore creates no 'back-to-back' relationships with any existing or consented neighbouring homes. All external relationships are across streets, where expectations of privacy are inherently lower. To the north, the separation to the recently completed homes in Nilgun Canver Court is approximately 14 m across the new street. To the south, the distance to the emerging Phase 5 Alexandra Gate development is around 17 m, with the loggia adding a further 2 m of separation along much of this frontage. Within the scheme itself, the only location where a true 'back-to-back' relationship could arise and where a higher expectation of privacy is therefore required is across the podium garden, where the separation is approximately 19 m. Should residential development come forward on either corner plot in the future, the layout of this proposal provides ample scope for those schemes to avoid any harmful overlooking.

6.9.12 It is commonly accepted that around 18 m is the distance at which facial recognition becomes difficult, and therefore distances of 18 m or more are generally considered to provide adequate privacy. On this basis, only the flats and maisonettes on the north side come close enough to neighbouring dwellings for any potential concern, and even here the 14 m separation is across a road and not significantly below the recognised ideal, and could easily be supplemented by residents using blinds or curtains if they choose. It is also accepted that an 18 metres distance in a built up urban environment is not always achievable, and an element of overlooking is unavoidable in an urban environment. However, it is considered that the proposal has sought to provide as much privacy as possible. Importantly, this relationship mirrors that already approved under the Chocolate Factory Phase 1 permission, which established a very similar arrangement between Nilgun Canver Court and the corresponding block on this site. The proposal therefore maintains an already accepted level of privacy within this part of the masterplan.

*Other Amenity Considerations*

6.9.13 Policy DM23 of the DM DPD 2017 states that new developments should not have a detrimental impact on air quality, noise or light pollution.

6.9.14 The submitted Air Quality Assessment (AQA) concludes, and officers agree, that the development is not considered to be contrary to any of the national and local planning policies regarding air quality.

6.9.15 It is anticipated that light emitted from internal rooms of the proposed buildings would not have a significant impact on neighbouring occupiers in the context of this urban area.

6.9.16 Any dust and noise relating to demolition and construction works would be temporary impacts that are typically controlled by non-planning legislation. Nevertheless, the demolition and construction methodology for the development would be controlled by condition.

6.9.17 Therefore, it is considered that the proposal would have an acceptable impact on neighbour amenity.

## **6.10 Parking and Highways**

6.10.1 Policy SP7 of the Local Plan 2017 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking and cycling. This approach is continued in Policies DM31 and DM32 of the DM DPD 2017.

6.10.2 Policy T1 of the London Plan 2021 sets out the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. This policy also promotes development that makes the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport. Policy T6 of the London Plan 2021 sets out cycle parking requirements for developments, including minimum standards. Policy T7 of the London Plan 2017 concerns car parking and sets out that 'car-free' development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.1 of the London Plan 2017 sets out requirements for residential car parking spaces.

6.10.3 The site has a public transport accessibility level (PTAL) rating of 4 which is considered to have good access to public transport services. The nearest station to the site is Wood Green Underground Station which is a 9 minute walk away and Alexandra Palace National Rail station a 10 to 11 minute walk away. Two different bus services are accessible within 6 to 7 minutes' walk of the site. There will be enhancements to the bus network, one extended route will serve Western Road and another will serve Coburg Road, including a temporary bus stand. The site is located within Wood Green Outer Zone Controlled Parking Zone which restricts parking to permit holders Monday to Saturday 08:00 – 18:30.

### *Trip generation*

6.10.4 The Transport officer has been consulted and notes that the applicant's TRICS-based assessment compares the existing education use with the proposed residential and commercial development. The current use generates activity

associated with around 60 people on site at any one time. For the proposed scheme, the assessment forecasts that most peak-hour movements will be made on foot, with public transport accounting for the majority of remaining trips. The commercial/workspace element is expected to generate a small number of peak-hour trips, all by sustainable modes. Although cycling demand is forecast to be low, overall trip-generation levels reflect the site's PTAL 4 rating and proximity to Wood Green Underground Station, local bus routes and Alexandra Palace rail station. In total, the development is expected to generate 117 two-way trips in the AM peak and 88 in the PM peak, with the majority undertaken by sustainable travel modes.

6.10.5 The proposal would be a car free development with the exception of blue badge car parking. Given the location within a Controlled Parking Zone and with the PTAL of 4 the proposal would meet the criteria of Policy DM32 for a car free/permit free development. Due to space limitations on the site, it is not possible to provide accessible parking bays within the development. As a result, the applicant proposes 12 accessible bays in nearby on-street and off-street locations, though this is not ideal as public-highway bays are available to all Blue Badge holders. The applicant will monitor demand through the Travel Plan and provide additional bays if required, however, with the trigger to be secured through the Car Parking Management Plan. A January 2025 Parking Stress Survey shows local parking stress ranging from 50.7% to 78.87%, well below the 85% threshold, indicating spare capacity. Consequently, reallocating two existing bays for refuse collection is not expected to have any detrimental impact on local parking conditions.

#### *Cycle parking*

6.10.6 In terms of cycle parking the residential use proposes to make provision for 275 long-stay and 7 short-stay, and the commercial use 6 long-stay spaces and 1 short stay space. The proposal includes seven residential cycle stores located at first-floor level, one of which is designed as an accessible store. These stores would be accessed via the primary cycle lift located on the ground floor, accessed from Western Road. A secondary/contingency lift accessed from New Street would also be provided to maintain access when the primary lift is not in use. The cycle parking for the commercial use is to be located within a dedicated ground floor cycle store. The short-stay parking spaces are proposed along New Street.

6.10.7 The Transport officer notes that the applicant's TRICS-based forecast suggests that only two outbound cycle trips would occur during the AM peak (08:00–09:00), and only one inbound and one outbound trip during the PM peak (17:00–18:00). This appears unrealistically low for a 150 home development with 275 long-stay residential cycle parking spaces.

6.10.8 Given this, the transport officer advises that the applicant would need to give serious consideration to how some form of dedicated ground-floor cycle provision—particularly for accessible cycles—could be re-provided. In addition, the

applicant should explore alternative long-stay cycle options, such as financial contributions towards dockless cycle-hire facilities, cycle hangars, Brompton lockers or similar measures. The Council's Transport Officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

- 6.10.9 The design and arrangement of all cycle parking will need to meet the requirements of TfL's London Cycle Design Standards.

*Highways Works*

- 6.10.10 The Transport officer notes that the applicant has committed, through the Transport Assessment, to remove the existing vehicular access on Clarendon Road and reinstate the full kerb and footway, including carriageway realignment to create new on-street wheelchair-accessible parking bays. These works will need to be secured through the Directors' agreement letter. This is in addition to the standard requirement for the applicant to make good any damage to the surrounding highway and footways arising from construction and demolition activities, as well as to deliver the agreed minor highway improvements that support active travel around the site perimeter.

*Servicing and Delivery Management Plan*

- 6.10.11 The Transport officer notes that the applicant has submitted a detailed Servicing and Delivery Management Plan setting out how servicing activity will be managed both temporarily—should the development be occupied before New Street is fully operational—and in the long term. The strategy includes a new inset loading bay on New Street, controlled by Homes for Haringey, which will accommodate delivery vehicles and refuse collection and provide a safe and efficient arrangement for the development's servicing needs.
- 6.10.12 For the southern block, refuse collection will take place from Coburg Road, requiring the temporary suspension of approximately two on-street parking bays. Vehicles can approach from either direction and exit in forward gear. For the northern block, refuse collection will be undertaken from the new inset loading bay on New Street. The first section of New Street is already complete, and once the full connection to Clarendon Road is delivered, the street will operate one-way, allowing safe forward-gear access and egress.
- 6.10.13 If the development becomes occupied before New Street is complete, a temporary arrangement has been agreed with the Council whereby refuse vehicles would undertake a supervised, controlled reverse manoeuvre from Western Road onto New Street. Further detail is required on how vulnerable road users will be safeguarded during any reversing manoeuvres, and on the expected duration of the temporary measures.

6.10.14 The transport officer advises a predicted 14 daily arrivals (13 LGVs) for 150 homes is considered unrealistically low given current patterns of online retail and supermarket deliveries. It is also unclear what measures are proposed to encourage trip-chaining or consolidation. The Council's Transport Officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition

*Site Access and wayfinding (Active Travel Zones)*

6.10.15 The applicant's Transport Assessment includes a Transport for London (TfL) Active Travel Assessment of five key routes to and from the site. From this, the applicant has identified a series of potential active travel interventions that could be supported through a financial contribution. These proposals are welcomed and officers supports their inclusion within the scheme, to be secured through the Directors' agreement letter, to enhance active-travel infrastructure serving the development.

6.10.16 In addition, the applicant will be required to work with Transport for London (TfL) and the council to agree improvements to local wayfinding, such as the installation of a Legible London board near the site, funded and secured through the Directors' agreement letter. Any such provision will need to comply with Transport for London's (TfL) Yellow Book guidance.

*Travel Plan*

6.10.17 A travel plan for the commercial and residential use will need to be submitted to ensure that the development proposal encourages travel by sustainable modes of transport to and from the development. The applicant will need to enter into a Directors' agreement letter to monitor the development proposal in this regard.

*Construction/Demolition Management Plan*

6.10.18 An outline construction logistics plan has been submitted and reviewed by the Council's Transportation Team. The applicant will need to ensure that the impact of both the construction and demolition phases is fully mitigated on both the local highway and transport network and the local community. This will be addressed by the full Demolition and Construction Logistics Plan. However, it is appropriate for this to be provided at a later stage, but prior to the commencement of works, and as such this matter can be secured via the Directors' agreement letter.

6.10.19 Transport for London (TfL) accepts the proposal in principle subject to conditions and securing mitigations through the relevant Directors' agreement letter.

6.10.20 Overall it is considered that the application is acceptable in transport and parking terms, and in terms of its impact on the public highway.

## **6.11 Sustainability, Energy and Climate Change**

6.11.1 The NPPF requires development to contribute to the transition to a low carbon future, reduce energy consumption and contribute to and conserve the natural environment.

6.11.2 Policy SI2 of the London Plan 2021– ‘Minimising greenhouse gas emissions’, states that *major developments should be zero carbon, and in meeting the zero-carbon target, a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected*. Policy SP4 of the Local Plan 2017 requires all new developments to introduce measures that reduce energy use and carbon emissions. Residential development is required to achieve a reduction in CO2 emissions. Policy SP11 of the Local Plan 2017 requires all development to adopt sustainable design and construction techniques to minimise impacts on climate change and natural resources.

6.11.3 Policy DM1 of the DM DPD 2017 states that the Council will support design-led proposals that incorporate sustainable design and construction principles and Policy DM21 of the DM DPD 2017 expects new development to consider and implement sustainable design, layout and construction techniques.

6.11.4 The development guidelines within Site Allocation SA19 ‘*Wood Green Cultural Quarter (South)*’ of the SA DPD 2017 states that this site is identified as being in an area with potential for being part of a Decentralised Energy Network (DEN). Proposals should reference the Council’s latest decentralised energy masterplan regarding how to connect to the DEN, and the site’s potential role in delivering a network within the local area. Policy SI4 of the London Plan 2021 requires development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure; designs must reduce overheating in line with the Cooling Hierarchy.

6.11.5 The proposed development has sought to adopt a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to reduce carbon emissions.

### *Carbon Reduction*

6.11.6 Policy SP4 of the Local Plan 2017, requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy SI2.

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- 6.11.5 The proposed development has sought to adopt a progressive approach in relation to sustainability and energy to ensure that the most viable and effective solution is delivered to reduce carbon emissions.

#### *Carbon Reduction*

- 6.11.6 Policy SP4 of the Local Plan 2017, requires all new development to be zero carbon. The London Plan 2021 further confirms this in Policy SI2.
- 6.11.7 The development achieves a site-wide reduction of 66% carbon dioxide emissions over 2021 Building Regulations Part L, with SAP10.2 emission factors, communal ASHPs will be future proofed to be compatible with a 4<sup>th</sup> generation low-carbon network if it is available. LBH Carbon Management raises no objections to the proposal subject to some clarifications with regards to Energy Strategy, Overheating Strategy, Sustainability Strategy, Climate Change Adaptation and Whole Life Carbon Assessment.
- 6.11.8 The overall predicted reduction in CO2 emissions for the development shows an improvement of approximately 66% in carbon emissions with SAP10.2 carbon

factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 89.43 tonnes of CO<sub>2</sub> from a baseline of 135.39 tCO<sub>2</sub>/year.

- 6.11.9 This application has been modelled in the Planning House Planning Package (PHPP) software and the scheme has also been designed to Passivhaus standards, which is strongly supported. The applicant is strongly encouraged to achieve the full Passivhaus certification
- 6.11.10 Under 'Be Lean', the applicant has proposed a saving of 33.07 tCO<sub>2</sub> in carbon emissions (24%) through improved energy efficiency standards in key elements of the build, based on SAP10.2 carbon factors. This goes beyond the minimum 10%, this is supported by LBH Carbon Management however the GLA requested further actions to be taken under Be Lean, which is strongly supported by LBH Carbon Management.
- 6.11.11 The applicant is not proposing any 'Be Clean' measures. The development is within 500 meters of a planned Haringey District Energy Network, but the development has not proposed a connection due to the uncertainty of the current delivery programme of the DEN. However, the site will be future proofed to be compatible with a 4<sup>th</sup> generation low-carbon net network if it is available. A room for a future heat substation and a route to the edge of the site have been allowed to facilitate a future connection. Further details of the future heat substation can be secure by a condition.
- 6.11.12 In terms of the installation of various renewable technologies, the report concludes that communal air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the 'Be Green' requirement. A total of 56.36 tCO<sub>2</sub> (42%) reduction of emissions are proposed under Be Green measures. The GLA requested further actions to be taken on Be Green measures, which is strongly supported by LBH Carbon Management.
- 6.11.13 Under 'Be Seen', the applicant has provided a preliminary strategy to set up metering for energy use monitoring and reporting.

#### *Whole Life Carbon*

- 6.11.14 Policy SI2 of the London Plan requires development proposals referable to the Mayor of London to calculate carbon emissions over the lifetime of the development and demonstrate that appropriate actions have been taken to reduce life-cycle carbon emissions.
- 6.11.15 The upfront embodied carbon of the scheme has been heavily influenced by a requirement to design around the Crossrail 2 exclusion zone that runs underneath the site. As a result, more significant groundworks and bulkier superstructure are required.

6.11.16 The applicant has carried out option studies for concrete versus steel balcony frame and structural options for use of basement for attenuation, in both cases the lower embodied carbon options have been adopted.

6.11.17 Separately, a breakdown by material type study has shown concrete, steel and cement are the largest contributions to upfront carbon emission. The applicant has highlighted the next steps are to refine whole life carbon. and reduce the project's overall impact, these includes:

- Replacing early-stage benchmarks with project-specific data
- Optimising structural quantities
- Improving concrete and steel specifications
- Refining calculations against design team quantities.

6.11.18 Overall, the side-wide *Whole Life Carbon* (Modules A-C) meets GLA target. However if included the design stage contingency as required by RICS v2, it is over the GLA target marginally. Overall, the Carbon Officer considers it is acceptable taking into consideration of the impact of the structural design to avoid the Crossrail 2 exclusion zone. The applicant is required to submit a post-construction assessment to report on the developments actual whole life carbon emissions. This would be secured by a condition.

#### *Circular Economy*

6.11.19 Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans

6.11.20 The GLA requested further actions to be taken on circular economy, which is strongly supported by LBH Carbon Management.

6.11.21 The Council's Carbon Officer and the GLA is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by condition.

#### *Overheating*

6.11.22 London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

6.11.23 In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 and TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled a sample of 21 dwellings and communal corridors

under the London Weather Centre files. The sampled dwellings represent 101 dwellings, equivalent to 67% of the overall development (150 units).

6.11.24 The neighbouring development Alexandra Gate Phase 5 located to the south of the site, has an outline consented scheme with buildings of lower height and an emerging scheme with higher towers being proposed. The applicant has carried out the overheating analysis based on the outline consented scheme to address a higher overheating risk.

6.11.25 The Carbon Officer notes that scenarios have been modelled under 2020 DSY 1-3, 2050 DSY 1 and 2080 DSY 1 for predominantly naturally ventilated spaces. The applicant has also run DSY1 2020 assessment with Clarendon Phase 5's emerging scheme and they have confirmed that all flats continue to comply with Part O using the same assumptions

6.11.26 All spaces would pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, with different degrees of opening in response to acoustic and security constraints
- Glazing g-value of 0.5 on all elevations
- Shading from external balconies
- External roller shutters to bedrooms as shown in the proposed elevations (modelled as fixed shading covering 80% of the window to allow natural ventilation through the remaining 20% gap)
- MVHR (0.55 ACH)
- Cooling coils to the MVHR with 1kW cooling capacity 1kW tempered air coil added to the MVHR for 28 units
- No active cooling

6.11.27 Internal communal corridors in both towers were tested under 2020 DSY 1, both towers met the criteria maintaining internal temperature below 2C with increased ventilation rates of 0.25 and 0.45 ACH for the East and West towers respectively from baseline 0.1 ACH.

6.11.28 The proposed future mitigation measures include:

- To fully future-proof the development against 2020 DSY 2 and DYS 3, the scheme would require 1kW of pre-tempered to 126 apartments and 1.6 kW to 4 maisonettes. MEP design has been developed to accommodate these upgrades in the future.
- Against hotter weather in 2050 and 2080, pre-tempering cooling coil can be installed to units where not previously present and a larger unit where a smaller one was previously included.

6.11.29 The non-residential spaces include the commercial unit and the workspace areas. These areas have been assessed under mechanically conditioned spaces.

6.11.30 In order to pass the criteria of 2020s DSY 1, the following measures will be built:

- Building fabric
- MVHR and openable windows where possible
- VRF cooling system with cooling capacity of 75W/m<sup>2</sup>

6.11.31 In order to pass the criteria of 2020s DSY 1, the following measures will be built:

- Building fabric as stated above
- MVHR and openable windows where possible
- VRF cooling system with cooling capacity of 75W/m<sup>2</sup>

6.11.32 The Carbon officer requested further actions to be taken on overheating. The Council's Carbon Officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

#### *Sustainability*

6.11.33 The Carbon Officer notes that the sustainability measures proposed seeks to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO<sub>2</sub> emissions and landscape design.

6.11.34 A set of sustainability requirements for small non-residential spaces have been proposed, in lieu of BREEAM pre-assessment report for the workspace units.

6.11.35 The applicant has explained the proposed non-residential areas are relatively small (approximately 660m<sup>2</sup>) and are separated into a number of small units as flexible workspace. After carrying out an initial BREEAM pre-assessment report to identify the credits required to achieve a rating of 'Excellent', they have concluded the significant cost associated with meeting these requirements would be disproportionate to the minimal benefit achieved in terms of actual environmental performance.

6.11.36 However the applicant has proposed a set of sustainability requirements will be included as part of the Employer's Requirements, this is to ensure the appointed contractor will deliver the sustainable benefits following BREEAM's principle. The Council's Carbon Officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

## **6.12 Urban Greening, Trees and Ecology**

### *Urban Greening Factor*

6.12.1 Policy G5 of the London Plan 2021 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening provided by a development and aims to accelerate greening of the built

environment, ensuring a greener London as it grows. It calls on boroughs to develop their own UGF targets, tailored to local circumstances, but recommends an interim target score of 0.40 for proposed development that is predominantly residential.

6.12.2 An assessment of the Urban Greening Factor (UGF) has been provided by the applicant based on the surface cover types. The proposed scheme includes intensive green roof, standard trees planted in pits and permeable paving.

6.12.3 The scheme would achieve an Urban Greening Factor (UGF) of 0.24. The shortfall against the London Plan target arises from a number of site-specific constraints, including fire safety requirements, the need to safeguard rooftop space for mechanical plant and photovoltaic panels, and the provision of circulation and playspace. Notwithstanding these limitations while there may be some scope to marginally improve the UGF through detailed design at the next stage, it is acknowledged that achieving the policy target of 0.4 is not feasible for this site.

6.11.4 In recognition of this shortfall, the applicant has agreed to deliver enhanced public realm and greening improvements beyond the red-line boundary, including upgraded paving, new planters and additional street tree planting at the junction of Western Road and New Street. These measures would provide wider environmental and visual benefits to the surrounding area and help offset the on-site UGF shortfall. On this basis, the proposal is considered to represent an acceptable and pragmatic response to policy, having regard to site constraints and the overall public realm benefits delivered.

6.12.5 To ensure that opportunities to maximise urban greening are fully explored, a planning condition will be imposed requiring the submission of a detailed urban greening scheme, including updated Urban Greening Factor calculations, demonstrating the maximum achievable UGF deliverable as part of the development. While it is recognised that achieving the London Plan target of 0.4 is unlikely given the constrained nature of the site, the condition will require the applicant to optimise on-site greening through detailed design. This will be considered alongside the agreed public realm enhancements outside the red-line boundary, including additional planting, planters, paving and street trees in close proximity to the site, which will deliver wider greening and environmental benefits. Officers are satisfied that, taken together, this represents a reasonable and policy compliant approach that would incorporate greening measures to demonstrate how best endeavours have been made to reach the highest possible target. This can be appropriately secured by condition.

### ***Trees***

6.12.6 The NPPF (Para. 136) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree-lined. London Plan Policy G7 makes clear that development should seek to retain and protect trees of value and replace these where lost.

- 6.12.7 Policy SP13 of the Local Plan 2017 recognises that ‘trees play a significant role in improving environmental conditions and people’s quality of life’, where the policy in general seeks the protection, management and maintenance of existing trees.
- 6.12.8 The proposed development would involve the removal of three individual trees located in the southeast corner of the site. Of these, two are category B trees of moderate quality, each with an estimated remaining lifespan of approximately 20 years, and one is a category C tree of low quality. The applicant’s design team has explored alternative layouts to retain these trees; however, the constrained nature of the site, together with the requirements of the Crossrail 2 Safeguarding Zone, has significantly influenced the final layout and design
- 6.12.9 The Council’s Tree Officer advises that the removal of the two category B mature London Plane trees will require a mitigating solution in the form of a financial contribution for the CAVAT loss of these trees to allow the planting of standard trees within a 500 metre radius of the site. An aftercare and irrigation programme will be included for all new trees to establish their independence within the landscape. The Council’s Tree Officer will also plant a diverse range of tree species and those with larger canopies at maturity, where possible to increase canopy cover and mitigate the impacts of climate change. This contribution will need to be secured through the Directors’ agreement letter.
- 6.12.10 The proposal includes the planting of 11 new trees on the second-floor podium. Details of the proposed tree species are set out within the submitted Landscape and Access Statement. As a result, the development would deliver a net increase of 8 trees on the site. In addition, Phase 4 of the Alexandra Gate development (formerly known as Clarendon Square), approved under planning reference HGY/2023/2357, includes further street tree planting. This will deliver three new trees along the southern side of Coburg Road, directly opposite the application site. Street tree planting along the northern side of Coburg Road is not feasible due to the limited footway width on this side of the street.

### *Ecology*

- 6.12.11 Policy G6 of the London Plan 2021 seeks to manage impacts on biodiversity and aims to secure biodiversity net gain.
- 6.12.12 Policy SP11 of the Local Plan 2017 promotes high quality landscaping on and off-site and Policy SP13 of the Local Plan 2017 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation.
- 6.12.13 Policy DM1 of the DM DPD 2017 requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site. Policy DM21 of

the DM DPD 2021 expects proposals to maximise opportunities to enhance biodiversity on-site.

6.11.14 Biodiversity Net Gain (BNG) is an approach to development which makes sure that habitats for wildlife are left in a measurably better state than they were before the development.

6.12.15 The Environment Act 2021 introduced a statutory requirement to deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

6.12.16 The applicant's Biodiversity Net Gain Assessment sets out that the site has a baseline habitat of 0.37 (low value) due to the developed nature of the site which is mostly hardstanding or other built surfaces and limited existing ecological interest. The post-development habitat through the incorporation of extensive biodiverse green roofs, new planting across podium and roof terrace areas, and the introduction of species-rich landscaping demonstrates that the proposal would achieve a net gain of 14.12%, increasing biodiversity value from 0.37 habitat units at baseline to 0.42 habitat units post-development, thereby exceeding the minimum 10% requirement.

### **6.13 Flood Risk and Drainage**

6.13.1 Policy SP5 of the Local Plan 2017 and Policy DM24 of the DM DPD 2017 seeks to ensure that new development reduces the risk of flooding and provide suitable measures for drainage.

6.13.2 The site falls within Flood Zone 1, which has the lowest risk of flooding from tidal and fluvial sources. The applicant has submitted a Flood Risk Assessment and Sustainable Drainage Assessment. The applicant will be required to submit a full hydraulic calculations, including a network diagram cross-referencing all drainage elements. The Council's Flood and Water Management officer is satisfied this can be adequately addressed at a later stage, and as such this matter can be secured by the imposition of a condition.

6.13.3 Thames Water raises no objection with regards to surface water drainage and foul water network capacity. Thames Water recommends imposing conditions regarding piling, underground water strategic water main and development and infrastructure phasing plan. The recommended conditions will be included on any grant of planning permission.

### **6.14 Air Quality and Land Contamination**

*Air Quality*

6.14.1 Policy DM23 of the DM DPD 2017 requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development. An Air Quality Assessment (AQA) was prepared to support the planning application and concluded that future occupants would experience acceptable air quality with pollutant concentrations below the air quality objectives. It also highlighted that the air quality impacts from the proposed development during its demolition and construction phase would not be significant and that in air quality terms it would not conflict with national or local planning policies. Officers have considered this assessment and agree with its findings.

6.14.2 The proposed development is considered to be air quality neutral given the building and transport related emissions associated with the proposed development are both below the relevant benchmarks.

6.14.3 Demolition and construction works are temporary and can be mitigated through the requirements of the Air Quality and Dust Management Plan to include air quality control measures such as dust suppression. The Council's Lead Pollution Officer raises no objection to the proposal subject to the relevant condition being imposed in respect of management and control of dust. The proposal is not considered an air quality risk, nor would it cause potential harm to nearby residents, or future occupiers.

#### *Land Contamination*

6.14.4 Policy DM23 (Part G) of the DM DPD 2017 requires proposals to demonstrate that any risks associated with land contamination can be adequately addressed to make the development safe.

6.14.5 Prior to redevelopment of the site a desktop study will need to be carried out and include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.

6.14.6 On this basis, the Pollution Officer raises no objections to the proposal subject to the relevant conditions being imposed in respect of land contamination and unexpected contamination and an informative regarding asbestos should consent be granted.

### **6.15 Fire Safety**

6.15.1 Policy D12 of the London Plan 2021 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be supported by a Fire Statement. The Mayor of London has published draft guidance on Fire Safety (Policy D12(A)), Evacuation lifts (Policy D5(B5)) and Fire Statements (Policy D12(B)).

6.15.2 The application is supported by a Fire Statement and a Gateway 1 Fire Statement which sets out how the design and construction of the buildings will seek to satisfy the functional requirements of Part B of Volume 1 to the Building Regulations 2010 (as amended, 2024) and relevant British Standards.

6.15.3 The Fire Statement confirms that the development comprises two tower blocks connected at lower levels by a podium, with building heights of approximately 68.1 metres (22 storeys) for the eastern building, 42.2 metres (14 storeys) for the western building, and a lower connecting block of approximately 7.5 metres. Each residential tower would be served on all storeys by two stair cores, comprising a dedicated evacuation stair and a firefighting stair. The firefighting stair cores would include firefighting lifts, smoke-ventilated firefighting lobbies, and fire mains, with a dry rising main serving the western building and a wet rising main serving the eastern building. The commercial workspace areas would also be provided with two escape stairs and an evacuation lift.

6.15.4 The Health and Safety Executive (HSE) / Building Safety Regulator (BSR) has not objected to the development and has stated it is “content” with the fire safety design at Gateway 1 stage. The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control Body at subsequent Gateway stages. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of work, the relevant Building Control Body would issue a Completion Certificate to confirm that the works comply with the requirement of the Building Regulations.

6.15.5 In light of the above, the application is considered to be acceptable with regard to its impact on fire safety, in accordance with national planning policy and the development plan.

## **6.16 Social and Community Infrastructure**

6.16.1 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.

6.16.2 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related policies concerning health, education, and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.

6.16.3 Strategic Policy SP16 sets out Haringey’s approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough.

Strategic Policy SP17 is clear that the infrastructure needed to make the development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth

- 6.16.4 DPD Policy DM48 notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL
- 6.16.5 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through CIL and use of planning obligations addressing relevant adverse impacts. The Council's Annual Infrastructure Funding Statement (December 2024 sets out what Strategic CIL can be used for (infrastructure list) and how it will be allocated (spending criteria).
- 6.16.6 Using the NHS London Healthy Urban Development Unit (HUDU) Planning Contributions Model, the NHS has sought a contribution of £83,000 to be paid on commencement and indexed linked to building costs has been requested.
- 6.16.7 Consistent with the position on other applications and as set out in the Council's latest published Annual Infrastructure Funding Statement (April 2024) the need for additional primary health care, acute care, and mental health provision should be addressed by considering the use of Strategic CIL to support new facilities rather than through s106 planning obligations.

## **6.17 Equalities**

- 6.17.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. Members must have regard to these duties in taking a decision on this application.
- 6.17.2 In line with the Public Sector Equality Duty, the proposed development has been assessed for its impacts on people with protected characteristics. The scheme would advance equality by delivering 150 social rent homes in an area of high deprivation, helping to address housing need among groups disproportionately affected by disadvantage, including disabled people, low-income households and Black, Asian and Minority Ethnic communities.
- 6.17.3 The redevelopment of Mallard Place requires the relocation of Area 51 Education, a private specialist SEND provider. The applicant advises that the Council recognises the importance of this service and is actively working with the operator

to identify suitable alternative premises within the Borough. The Greater London Authority's (GLA) Stage 1 response notes that alternative accommodation should be secured prior to closure to avoid adverse impacts on young and disabled people, and this matter is being progressed accordingly.

6.17.4 The GLA has also identified potential impacts arising from construction activity in close proximity to John Raphael House, a place of worship. These impacts will be mitigated through a Construction Management Plan, including measures for engagement with the adjoining use.

6.17.5 Subject to the mitigation measures being secured through the planning process, officers are satisfied that due regard has been given to the Equality Act 2010 and that the proposal accords with relevant equality objectives and planning policy.

## **6.18 Employment**

6.18.1 Policies SP8 and SP9 of the Local Plan 2017 aim to support local employment, improve skills and training, and support access to jobs. The Council's Planning Obligations SPD 2017 requires all major developments to contribute towards local employment and training.

6.18.2 There would be opportunities for borough residents to be trained and employed as part of the development's demolition and construction process, and once the proposal is occupied. The developer (and its contractors and sub-contractors) would be required to notify of job vacancies, and to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council) during and following construction. These requirements would be secured by Directors' agreement letter should permission be granted.

6.18.3 As such, the development is acceptable in terms of employment provision.

## **6.19 Conclusion**

- Planning policy recognises the important role that medium-sized sites play in meeting identified housing needs across the Borough, particularly within designated growth areas with good access to public transport and existing neighbourhood facilities, where higher-density development is encouraged. The proposed scheme follows a design-led approach that capitalises on the site's highly accessible location to deliver 100% social rent homes, making a significant contribution to the Borough's affordable housing targets while supporting the creation of a mixed and balanced community. The proposal therefore accords with the objectives of both local and strategic planning policies aimed at maximising the delivery of genuinely affordable housing in accessible locations.

- The proposal would redevelop a brownfield site, with a high-quality mixed use development which responds appropriately to the local context would fulfil and meet the requirements of Site Allocation SA19 'Wood Green Cultural Quarter (South)'
- The development would provide 539sqm of quality flexible commercial floorspace that would potentially generate 28 jobs, an uplift over the existing 8 FTE jobs.
- The development would provide 150 homes, contributing towards much needed housing stock in the borough.
- The size, mix, and quality of residential accommodation is acceptable, and the homes would either meet or exceed relevant planning policy standards. All homes would have private external amenity space.
- The proposal would provide street scene improvements including a high quality new buildings with an active frontage and new and enhanced public realm;
- The development would have a positive impact on the quality of the immediate surroundings of the Wood Green Common Conservation Area.
- There would be no significant adverse impacts on the surrounding highway network or on car parking conditions in the area.
- The development would achieve a reduction of 66% carbon dioxide emissions over Building Regulations Part L 2021 and provide appropriate carbon reduction measures plus a carbon off-setting payment, as well as site drainage and a Biodiversity Net Gain of 14.12% (BNG) improvements which is in excess of the mandatory 10% net gain required;
- The proposed development will secure several obligations including financial contributions to mitigate the residual impacts of the development.

## **7.0 COMMUNITY INFRASTRUCTURE LEVY**

Based on the information given on the plans, the Mayoral CIL charge will be £ (sqm x £72.73) and the Haringey CIL charge will be £ (sqm x £276.16). These rates are based on the Annual CIL Rate Summary for 2026 This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge

## **8.0 RECOMMENDATIONS**

8.1 GRANT PERMISSION subject to conditions in Appendix 1, and securing a legal Directors' agreement letter; and subject to referral to the Mayor of London and any direction they make.



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## Appendix 1 - Planning Conditions/Informatives

### Conditions:

1. Time Limit (Compliance)
2. Approved plans and documents (Compliance)
3. Materials and detailing (Prior to commencement)
4. Boundary Treatment and access control (Pre-occupation)
5. Landscaping (Prior to commencement of relevant part)
6. Play equipment
7. Biodiversity Net Gain Plan (Pre-occupation)
8. BNG Monitoring (Pre-occupation)
9. Lighting (Pre-occupation)
10. Noise from building services plant and vents (Compliance)
11. Secure by Design Accreditation (Pre-above ground works)
12. Secure by Design Certification (Pre-occupation)
13. Flood & Water Lead - Surface Water Drainage (Pre-commencement)
14. Flood & Water Lead - SuDS management and Maintenance Strategy (Pre-occupation)
15. Thames Water - Piling Method Statement (Pre-commencement)
16. Crossrail 2 - Detailed Design and Method Statement
17. Land Contamination (Pre-commencement)
18. Unexpected contamination (if identified)
19. NRMM (Pre-commencement)
20. Management and Control of Dust (Pre-commencement)
21. Delivery and Servicing Management Plan (Pre-occupation)
22. Considerate Constructors (Compliance)
23. Energy Strategy (Pre-above ground works)
24. Sustainability Review
25. Be Seen
26. Overheating (Pre-above ground works)
27. Building use guide
28. Sustainability Standards for non-residential units
29. Living Roofs (Pre-above ground works)
30. Climate Change adaption
31. Circular Economy (Pre-Construction report, Post Completion report)
32. Whole Life Carbon
33. Urban Green Factor (Compliance)
34. Arboricultural Method Statement (Compliance)
35. Cycle Parking (Pre-occupation) – *ref the external short stay storage*
36. Accessible Parking Bay(s) (Pre-commencement)
37. Waste/Recycling Storage (Prior to commencement of relevant part)
38. Restriction to Telecommunications Apparatus (Restriction)
39. Building Regulations Part M (Compliance)
40. Communal antennae
41. Commercial Units – Hours of operation
42. Commercial Shopfront
43. Restriction to Use Class
44. Architect Retention
45. Air Quality Neutral
46. Internal Playspace

### **Informatives**

- 1) Positive and Proactive
- 2) Directors Agreement Letter
- 3) CIL
- 4) Land Ownership
- 5) Party Wall Act
- 6) Hours of Construction
- 7) Street Numbering/Naming
- 8) Asbestos
- 9) Metropolitan Police Service Designing Out Crime
- 10) Crossrail 2
- 11) Thames Water
- 12) Thames Water
- 13) Water Consumption

### **CONDITIONS**

#### **Time Limit (Compliance)**

1. The development hereby authorised must be begun not later than the expiration of 3 years from the date of this permission, failing which the permission shall be of no effect.

Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.

#### **Approved Plans and Documents (Compliance)**

2. The development hereby authorised shall be carried out in accordance with the following approved plans and specifications:

As listed in Appendix 5

Reason: In order to avoid doubt and in the interests of good planning.

#### **Materials and detailing (Prior to commencement of above ground works)**

3. Prior to the commencement of above ground works of the relevant part of the development detailed drawings (including sections) to a scale of 1:20 to confirm the detailed design and materials of the:

- a) Detailed elevational treatment;
- b) Detailing of roof and parapet treatment;

- c) Windows and doors (including plan, elevation and section drawings indicating jamb, head, cill, reveal and surrounds of all external windows and doors at a scale of 1:10), which shall include a recess of at least 115mm;
- d) Details of street furniture;
- e) Details and locations of down pipes, rainwater pipes or foul pipes and all external vents;
- f) Details of balustrading;
- g) Facing brickwork: sample panels of proposed brickwork to be used showing the colour, texture, pointing, bond, mortar, and brickwork detailing shall be provided;
- h) Details of all enclosures and plant; and
- i) Any other external materials to be used;

together with a full schedule of the exact product references for all materials shall be submitted to, and approved in writing by, the Local Planning Authority. The relevant part of the development shall not be occupied until the development has been carried out accordance with the approved details. The development shall thereafter be retained as such for its lifetime.

Reason: To safeguard and enhance the visual amenities of the locality and to comply with Policies DM1, DM8 and DM9 of the Development Management Development Plan Document 2017.

#### **Boundary treatment and access control (Pre-occupation)**

- 4. Prior to occupation of the development hereby approved details of exact finishing materials and heights to the boundary treatments and confirmation of and site access controls shall be submitted to, and approved in writing by, the Local Planning Authority. The development shall not be occupied until it has been constructed in accordance with the approved details, and thereafter the development shall be retained as such for its lifetime.

Reason: In order to provide a good quality local character, to protect residential amenity, and to promote secure and accessible environments and to comply with Policies DM1, DM2 and DM3 of the Development Management Development Plan Document 2017.

#### **Landscaping (Pre-occupation)**

- 5. Prior to occupation of the development hereby approved, full details of both hard and soft landscape works shall be submitted to, and approved in writing by, the Local Planning Authority. These details shall include information regarding, as appropriate:
  - a) Proposed finished levels or contours;
  - b) Means of enclosure, screens and built in planters, including raised planters to the homes located at ground floor level;
  - c) Hard surfacing materials;
  - d) Minor artefacts and structures (e.g. Furniture, signs, lighting etc.); and

e) Proposed and existing functional services above and below ground (e.g. Drainage power, communications cables, pipelines etc. Indicating lines, manholes, supports etc.).

The development shall not be occupied until the hard landscaping has been provided in accordance with the approved details, and thereafter the development shall be retained as such for the lifetime of the development.

Soft landscape works shall include:

- f) Planting plans;
- g) Written specifications (including details of cultivation and other operations associated with plant and/or grass establishment);
- h) Schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate;
- i) Implementation and management programmes, including any required irrigation system and loading integrated into the podium garden; and
- j) Detailed drawings of any new trees and shrubs to be planted together with a schedule of species.

The approved scheme of planting, seeding or turfing comprised in the approved details of landscaping shall be carried out and implemented in accordance with the approved details in the first planting and seeding season following the occupation of the building or the completion of development (whichever is sooner). Any trees or plants, either existing or proposed, which, within a period of five years from the completion of the development die, are removed, become damaged or diseased shall be replaced in the next planting season with a similar size and species. The landscaping scheme, once implemented, is to be retained thereafter.

Reason: In order for the Local Planning Authority to assess the acceptability of any landscaping scheme in relation to the site itself, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area and to comply with Policy SP11 of the Local Plan 2017 and Policy DM1 of the Development Management Development Plan Document 2017.

**Play equipment (Prior to the commencement of the relevant part)**

6. Prior to the commencement of the relevant part of the landscaping development hereby approved full details of the play equipment (including a mix of traditional swing / slide type equipment and natural play equipment) proposed, including a breakdown of equipment and age appropriateness shall be submitted to, and approved in writing by, the Local Planning Authority. The development shall not be occupied until the play equipment has been provided on site. The play equipment shall thereafter be retained as such for the lifetime of the development.

Reason: To ensure suitable play equipment is provided for the relevant age groups and that siting of most noise generating activities are located away from the most noise sensitive locations and to comply with Policy S4 of the London Plan 2021 and Policy DM1 of the Development Management Development Plan Document 2017.

### **Biodiversity Net Gain Plan (Pre-occupation)**

7. Prior to first occupation of the development hereby approved, and notwithstanding the Preliminary Ecological Appraisal prepared by Ecology and Land Management submitted, no works including demolition/site clearance shall take place until a Biodiversity Gain Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall demonstrate how the development will achieve a minimum of 10% biodiversity net gain, calculated using the latest Defra biodiversity metric, and shall include details of proposed measures such as:

- On-site habitat creation, including soft landscaping and tree planting;
- Biodiversity green roofs; and
- Any off-site biodiversity units or credits, if applicable.

The development shall be carried out and retained thereafter in full accordance with the approved Biodiversity Gain Plan.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990, in the interests of ensuring measurable net gains to biodiversity in accordance with paragraphs 187 and 192 of the National Planning Policy Framework 2024 and in order to comply with Policy G5 of the London Plan and Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

### **BNG Monitoring (Pre-occupation)**

8. Prior to first occupation of the development hereby approved, a Habitat Monitoring and Management Plan (HMMP) proportionate to the approved biodiversity measures shall be submitted to and approved in writing by the Local Planning Authority. The HMMP shall set out long-term management and monitoring arrangements and maintenance schedules for the biodiversity net gain measures, along with and a methodology to ensure the submission of monitoring reports. for a period of at least 30 years and shall be implemented in full and adhered to throughout that period. Monitoring reports shall be submitted to, and approved in writing by, the Local Planning Authority at years 2, 5, 7, 10, 20 and 30 from commencement of development, unless otherwise stated in the Biodiversity Net Gain Plan, demonstrating how the BNG is progressing towards achieving its objectives, evidence of arrangements, and any rectifying measures needed.

Reason: To ensure that the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and in the interests of ensuring measurable net gains to biodiversity in accordance with paragraphs 187 and 192 of the National Planning Policy Framework 2024.

### **Lighting (Pre-occupation)**

9. Prior to first occupation of the development hereby approved, details of all external lighting to building facades, street furniture, communal and public realm areas shall

have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Metropolitan Police. The development shall not be occupied until it has been constructed in accordance with the approved details, and thereafter the development shall be retained as such for the lifetime of the development.

Reason: To ensure the design quality of the development and also to safeguard residential amenity and to comply with Policy DM1 of the Development Management Development Plan Document 2017.

**Noise from building services plant and vents (Compliance)**

10. Noise emitted by all building services plant shall not exceed the existing measured lowest LA90(15min) background noise level at any time when all plant is in use. The noise emitted shall be measured or predicted at 1.0m from the facade of the nearest residential window or at 1.2m above any adjacent residential garden, terrace, balcony or patio. The equipment shall be serviced regularly in accordance with manufacturer's instructions and as necessary to ensure that the requirements of the condition are maintained. If at any time the plant is unable to comply with this condition, it shall be switched off and not used again until it is able to comply.

Reason: In order to protect the amenities of nearby residential occupiers and to comply with Policy D14 of the London Plan 2021 and Policy DM1 of the Development Management Development Plan Document 2017.

**Secure by Design Accreditation (Pre-above ground works)**

11. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve 'Secured by Design' Accreditation. Accreditation must be achievable according to current and relevant Secured by Design guidelines at the time of above groundworks of each building within the development. Each building shall not be occupied until it has been constructed in accordance with the approved details, and thereafter the development shall be retained as such for the lifetime of the development.

Reason: To ensure safe and secure development and reduce crime, and to comply with Policy D11 of the London Plan 2021 and Policy DM2 of the Development Management Development Plan Document 2017.

**Secured by Design Certification (Pre-occupation)**

12. Prior to the first occupation of each building or part of a building or its use hereby approved, 'Secured by Design' certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.

Reason: To ensure safe and secure development and reduce crime and to comply with Policy D11 of the London Plan 2021 and Policy DM2 of the Haringey Development Management Development Plan Document 2017.

#### **Surface Water Drainage (Pre-commencement)**

13. No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate:
- 1) Calculations including the Network Diagram cross referencing drainage elements confirming a full range of rainfall data for each return period for 7 days 24 hours provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change.
  - 2) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.
  - 3) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge.
  - 4) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.

Reason: In the interests of managing drainage and flood risk for the development, and to comply with Policies SI12 and SI13 of the London Plan 2021 and Policies DM24, DM25 and DM29 of the Haringey Development Management Development Plan Document 2017.

#### **SuDS Management and Maintenance Strategy (Pre-occupation)**

14. Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.

Reason: To prevent the increased risk of flooding, to improve water quality, to ensure future maintenance of the surface water drainage system and to comply with Policy DM25 of the Development Management Development Plan Document 2017.

#### **Thames Water Piling Method Statement (Pre-commencement)**

15. No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe, has been submitted to, and approved in writing by, the local planning authority in consultation with Thames Water. Any piling shall be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: In the interests of protecting the local underground sewerage utility infrastructure and to comply with Policy DM27 of the Development Management Development Plan Document 2017.

### **Crossrail 2 - Detailed Design and Method Statement (Pre-commencement)**

16. The development hereby permitted shall not commence until detailed design and construction method statements for all the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority which:
- (i) Accommodates the proposed location of the Crossrail 2 structures including tunnels, shafts and temporary works,
  - (ii) Accommodates ground movement arising from the construction thereof,
  - (iii) Mitigates the effects of noise and vibration arising from the operation of the Crossrail 2 railway within the tunnels and other structures,

The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required by paragraphs (i), (ii) and (iii) of this condition shall be completed, in their entirety, before any part of the building[s] [is] [are] occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for the operation of the Crossrail 2 railway, tunnels and other structures and to comply with Policy DM55 of the Development Management Development Plan Document 2017.

### **Land Contamination (Pre-commencement)**

17. Before development hereby approved commences, other than for investigative work:
- a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.
  - b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced.

The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.

c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.

d. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.

e. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety and to comply with Policy DM27 of the Development Management Development Plan Document 2017.

#### **Unexpected contamination (If identified)**

18. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site and to comply with paragraph 187 of the National Planning Policy Framework, and to comply with Policy DM27 of the Development Management Development Plan Document 2017.

#### **NRMM (Pre-commencement)**

19. a. Prior to the commencement of the development hereby approved, evidence of site registration at <http://nrmm.london/> to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded to the website during the demolition and construction phases of the development shall be submitted to, and approved in writing by, the Local Planning Authority.
- b. Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meet Stage IIIA of EU Directive 97/68/

EC for both NOx and PM emissions shall be submitted to, and approved in writing by, the Local Planning Authority.

c. During the course of any demolition, site preparation and construction phase, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.

Reason: To protect local air quality and comply with Policy SI1 of the London Plan 2021 and the GLA NRMM LEZ.

### **Management and Control of Dust (Pre-commencement)**

20. No development hereby approved shall be commenced until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted to, and approved in writing by, the Local Planning Authority. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. The works shall be carried out in accordance with the approved details thereafter.

Reason: To protect air quality and to comply with Policy SI1 of the London Plan 2021 and GLA SPG Dust and Emissions Control 2014.

### **Delivery and Servicing and Waste Management Plan (Pre-occupation)**

21. No development hereby approved shall be occupied until a Delivery and Servicing Plan (DSP) and Waste Management Plan have been submitted to, and approved in writing by, the Local Planning Authority. The DSP and Waste Management Plan shall be in place prior to first occupation of the development. The Waste Management Plan shall include details of how refuse, included bulky items, is to be collected from the development, and the plan shall be prepared in line with the requirements of the Council's waste management service which must ensure that all bins are within 10 metres carrying distance of a refuse truck on a waste collection day. It shall demonstrate how the development will include the consolidation of deliveries and enable last mile delivery using cargo bikes.

Details shall be provided on how deliveries can take place without impacting on the public highway, the document shall be produced in line with TfL guidance.

The Delivery and Servicing Plan (DSP) and Waste Management Plan must be reviewed annually in line with the travel plan for a period of 3 years unless otherwise agreed in writing in advance by the Local Highway Authority.

Reason: In order to ensure that the development does not prejudice the free flow of traffic or public safety along the neighbouring highway and to comply with the TfL DSP guidance 2020.

### **Considerate Constructors (Pre-commencement)**

22. Prior to the commencement of development, the Contractor Company shall register with the Considerate Constructors Scheme.

Reason: In order to protect the amenity of local residents and in the interests of reducing greenhouse gas emissions, and to comply with Policy SI2 of the London Plan 2021.

**Energy Strategy (Compliance)**

23. The development hereby approved shall be constructed in accordance with the Energy, Overheating and Sustainability Statement by Etude (dated Nov 2025) delivering a minimum 66% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, Mechanical Ventilation and Heat Recovery (MVHRs), centralised air source heat pumps (ASHPs) and a minimum 19.8 kWp solar photovoltaic (PV) array and a single point future DEN connection.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 24% reduction;
- Details to reduce thermal bridging;
- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); inverter capacity; and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions, if relevant;

The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.

(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed

with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.

(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and to comply with Policy SI2 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM22 of the Development Management Development Plan Document 2017.

#### **Sustainability Review (Pre-occupation)**

24. Prior to the occupation of the development, an assessment shall be provided to be approved in writing by the Local Planning Authority, which shall include an as built detailed energy assessment of the development prepared in accordance with London Plan and Council policies which:
- a. explains and provides evidence to demonstrate whether or not the development has been constructed and completed in accordance with the Approved Energy Plan in particular whether the 100% CO2 emission reduction target has been met;
  - b. explains and provides evidence to demonstrate whether or not the development following occupation complies with London Plan and Local Planning Authority policies;
  - c. provides evidence to support (a) to (b) above including but not limited to photographic evidence, air tightness test certificates and as-built energy performance certificates; and
  - d. such other information reasonably requested by the Local Planning Authority.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and to comply with Policy SI2 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM22 of the Development Management Development Plan Document 2017.

#### **Be Seen (Prior to completion of superstructure)**

25. (a) Prior to the completion of the superstructure a detailed scheme for energy monitoring shall have been submitted to and approved in writing by the Local Planning Authority. This shall include details of suitable automatic meter reading devices for the

monitoring of energy use and renewable/low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building.

(b) Prior to each Building being occupied, the Owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the 'As-built stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance.

(c) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.

(d) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).

All data and supporting evidence should be submitted to the GLA using the 'Be Seen' reporting webform (<https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance>). ) If the 'In-use stage' evidence shows that the 'As-built stage' performance estimates have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.

Reason: To ensure the development can comply with the Energy Hierarchy and to comply with Policy SI2 of the London Plan 2021 and Policy SP4 of the Local Plan 2017.

### **Overheating (Prior to above ground works)**

26. Prior to the commencement of above ground works, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, confirm the mitigation measures, and propose a retrofit plan. This assessment shall be based on the Energy, Overheating and Sustainability Statement by Etude (dated Nov 2025) as a starting point, taking into account the outstanding requirements at application stage.

This report shall include:

- Revised modelling of units modelled based on CIBSE TM52 and TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1

2050s and 2080s, high emissions, 50% percentile with openable and closed window scenarios;

- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures by following the Cooling Hierarchy;
- Modelling of mitigation measures required to pass current and future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;
- Details of external roller blinds including dimensions and specifications, access and maintenance strategy;
- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

(b) Prior to occupation, the development shall be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- Openable windows;
- External roller shutters;
- Window g-values of 0.5;
- MVHRs (with cooling coils for specific dwellings where necessary)
- Hot water pipes insulated to high standards.
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained and to comply with Policy SI4 of the London Plan 2021, Policy SP5 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

### **Building User Guide (Pre-occupation)**

27. Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems for different heatwave scenarios. It shall include details on the operation and the required maintenance of the external roller shutters. The Building User Guide shall be easy to understand and will be issued to any residential occupants before they move in and should be kept online for residents to refer to easily.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk and to comply with Policy SI4 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

**Sustainability standards for non-residential units (Prior to above ground works)**

28. Prior to the commencement of above ground works to deliver the non-residential units hereby approved, evidence to demonstrate all Sustainability Requirements for Small Non-Residential Spaces as set out in Appendix D.2 of Energy, Overheating and Sustainability Statement Appendices (prepared by Etude dated Oct 2025) have been achieved shall have been submitted to, and approved in writing by, the Local Planning Authority. The non-residential development shall only be occupied in accordance with the approved details, and they shall be retained as such for the lifetime of the development.

Reason: In the interest of addressing climate change and securing sustainable development and to comply with Policies SI2, SI3 and SI4 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

**Living Roofs (Prior to above ground works)**

29. (a) Prior to the above ground commencement of development, details of the living roofs shall be submitted to, and approved in writing by, the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:
- i) A roof plan identifying where the living roofs will be located;
  - ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);
  - iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate
  - iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;
  - v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with root ball of plugs 25cm<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);
  - vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
  - vii) Management and maintenance plan, including frequency of watering arrangements.
  - viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;

(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall and to comply with Policies G1, G5, G6, S11 and S12 of the London Plan 2021 and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

### **Climate Change Adaption (Prior to above ground works)**

30. Prior to the commencement of above ground works, annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts shall have been submitted to, and approved in writing by, the Local Planning Authority. The development shall only be occupied in accordance with the approved details, and the scheme shall be retained as such for the lifetime of the development.

Reason: In the interest of addressing climate change and securing sustainable development and to comply with Policies S12, and S17 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

### **Circular Economy Pre-Construction report, Post Completion report (Pre-occupation)**

31. Prior to the occupation of the development, a Post-Construction Monitoring Report shall be completed in line with the GLA's Circular Economy Statement Guidance.

The relevant Circular Economy Statement shall be submitted to the GLA at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development].

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials and to comply with Policies D3, S12 and S17 of the London Plan 2021, Policies SP4 and SP6 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

### **Whole Life Carbon (Pre-occupation)**

32. Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template shall be completed in line with the GLA's Whole Life

Carbon Assessment Guidance. The post-construction assessment shall provide an update of the information submitted at planning submission stage. This shall be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings and to comply with Policy SI2 of the London Plan 2021 Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

### **Urban Greening Factor (Pre-completion)**

33. The development hereby approved shall meet its 0.24 Urban Greening Factor (UGF) score identified within the planning application submissions as a minimum. Every measure shall be taken, through detailed design work, to increase the Urban Greening Factor (UGF) to 0.4. Prior to completion of the construction work, an Urban Greening Factor analysis, with the anticipated end calculation for the scheme, shall be submitted to, and approved in writing by, the Local Planning Authority, demonstrating the maximum target that will be met through greening measures. If a UGF of 0.4 is not achievable, demonstrable evidence shall be submitted to demonstrate how best endeavours have been made to reach the highest possible target.

Reason: To ensure that the development provides the maximum provision towards the urban greening of the local environment, creation of habitats for biodiversity and the mitigation and adaptation of climate change and to comply with Policies G1, G5, G6, SI1 and SI12 of the London Plan 2021 and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

### **Arboricultural Method Statement (Compliance)**

34. The development hereby approved shall be carried out in accordance with the recommendations set out in the Arboricultural Method Statement by Sharon Hosegood Associates dated May 2025, which has been drafted in accordance with industry best practice and specifies all the necessary measures to be implemented to ensure the trees being retained will be adequately protected.

Reason: In order to ensure the safety and wellbeing of the trees on the site during construction works that are to remain after building works are completed and to comply with Policy G7 of the London Plan 2021 and Policy DM1 of the Development Management Development Plan Document 2017.

### **Cycle Parking (Pre-occupation)**

35. The development hereby approved shall not be occupied until plans and details have been submitted to, and approved in writing by, the Local Planning Authority showing accessible, sheltered, weatherproof and secure cycle parking comprising a total of 275

long-stay residential cycle spaces and 8 short-stay residential spaces. An absolute minimum of 20% long-stay residential cycle parking should be to Sheffield Stand design specification. The design specification and quantum of cycle parking should be clearly annotated on submitted plans. Appropriate provision of bespoke long-stay cycle parking shall be provided where appropriate (depending upon the development type) to accommodate accessible bicycles, cargo bikes and e-bikes. Long-stay cycle parking shall be easily accessible from the public highway, minimising transit time through sets of doors etc. Short-stay cycle parking provided should be in a central, easily accessible position to Sheffield Stand design specification. The design must be in accordance with the London Cycle Design Standard. The development shall not be occupied until the approved details are implemented. These facilities shall thereafter be retained for the lifetime of the development.

The applicant is required to investigate the feasibility of affording alternative residential long-stay cycle parking provision by exploring the following possible options (or other opportunities) and agree in writing with Local Planning Authority on any deviation from the London Plan standard:

- Provision of long-stay residential cycle parking at ground floor level (at very least the accessible cycle parking).

For the proposed commercial/business use at the development site, a total long-stay and short-stay cycle parking spaces should be provided to London Plan standards. Long-stay cycle parking spaces should be easily accessible, weatherproof and secure. Wherever possible the design specification should be to Sheffield Stand. Appropriate changing/shower facilities and lockers should be provided for commercial/business users.

Reason: To ensure there is adequate cycle parking and to comply with Policy T5 of the London Plan 2021 and the London Cycle Design Standards (LCDS).

### **Accessible Parking Bays (Pre-occupation)**

36. The development shall not be occupied until plans and details have been submitted to, and approved in writing by, the Local Planning Authority showing that the proposed on-street accessible parking bays will be able to accommodate a wheelchair accessing and egressing their vehicle in a safe manner and the process for managing the 5 applicant controlled bays on New Street. If any of the accessible parking bays are to have EV charging capability, the type of charging should be annotated on plans. The trigger point for providing additional disabled/accessible on-street parking bays should be specified and assurances provided as to safeguarding of road space to facilitate any future additional bays.

Reason: In order to ensure there is appropriate provision of accessible parking bays for the development and to comply with Policy T6 of the London Plan 2021.

### **Waste/Recycling Storage (Prior to commencement)**

37. Prior to commencement of the development, a detailed scheme for the provision of refuse and waste storage and recycling facilities shall have been submitted to, and approved in writing by, the Local Planning Authority. Such a scheme as approved shall

be implemented prior to first occupation of the relevant part of the development hereby permitted and permanently retained thereafter.

Reason: In order to protect the amenities of the locality and to comply with Policy D6 of the London Plan 2021 and Policy DM4 of the Development Management Development Plan Document 2017.

**Restriction to Telecommunications Apparatus (Compliance)**

38. Notwithstanding any provisions to the contrary, no telecommunications apparatus shall be installed on the building without the prior written agreement of the Local Planning Authority.

Reason: In order to control the visual appearance of the development and to comply with Policies DM1 and DM9 of the Development Management Development Plan Document 2017.

**Building Regulations Part M (Compliance)**

39. Prior to occupation, the development (excluding the upper floor duplex apartments) shall have been built to Part M4(2) 'accessible and adaptable dwellings' of the Building Regulations 2013 (as amended), and at least 10% (four dwellings) shall have been built as wheelchair accessible, in accordance with Part M4(3) of the same Regulations. The development shall be retained as such thereafter for its lifetime.

Reason: To ensure that the accommodation provided is accessible.

**Antenna (Compliance/prior to occupation)**

40. The placement of a satellite dish or television antenna on any external surface of the development is precluded, with exception provided for a communal solution for the residential units details of which shall be submitted to, and approved in writing by, the Local Planning Authority prior to the first occupation of the development hereby approved. The equipment shall be provided in accordance with approved details and retained as such thereafter.

Reason: To protect the visual amenity of the locality and to comply with Policy DM1 of the Development Management Development Plan Document 2017.

**Commercial units - Hours of operation (Compliance)**

41. Any café/restaurant use (Use Class E(b)) shall only be open to the public between the hours of 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).

Reason: In order to protect residential amenity and to comply with Policy DM1 of the Development Management Development Plan Document 2017.

**Shopfront/Workspace frontage (Compliance)**

42. Notwithstanding the provisions of the Town and Country Planning (Control of Advertisements) Regulations 1984, all glazing of the shopfronts/workspace frontages shall be clear and untinted with no application of vinyls/graphic, so as not to obscure the glazing to the commercial shopfront. Any advertising signs on the frontage, shall require consent from the local planning authority.

Reason: In order to retain the design quality of the development in the interest of the visual amenity of the area and to comply with Policy SP11 of the Local Plan 2017.

**Restriction to Use Class (Compliance)**

43. Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the commercial units shall be occupied by flexible Use Class E only and shall not be used for any other purpose.

Reason: In order to restrict the use of the premises in the interest of the amenities of the area and to comply with Policy DM1 of the of the Development Management Development Plan Document 2017.

**Architect Retention (Compliance)**

44. The applicant shall ensure that the project architect (Levitt Bernstein) continues to be employed as the project architect through the whole of the demolition and construction phase for the development except where the architect has ceased trading. The applicant shall not submit any drawings relating to details of the design of the development that are required to be submitted pursuant to conditions of the planning permission unless such drawings have been prepared or overseen and agreed in writing by the project architect.

Reason: In order to retain the design quality of the development in the interest of the visual amenity of the area and to comply with Policy SP11 of the Local Plan 2017.

**Air Quality Neutral (Compliance)**

45. The development hereby approved shall not be occupied/used until it has achieved the Air Quality Neutral position, as set out in the hereby approved Air Quality Assessment prepared by Air Quality Consultants dated June 2024,

Reason: To protect local air quality and comply with Policy SI1 of the London Plan 2021 and the GLA NRMM LEZ.

**Internal Playspace (Prior to Occupation)**

46. Notwithstanding the plans hereby approved, 6 months prior to occupation of the development, full details of an internal play area within the commercial space shall be submitted to and approved by the Local Planning Authority and thereafter shall be fully implemented within 6 months of the development being completed and thereafter shall be retained for the lifetime of the development.

Reason: To ensure suitable play space is provided for the relevant age comply with Policy S4 of the London Plan 2021 and Policy DM1 of the Development Management Development Plan Document 2017.

## **INFORMATIVES:**

### **1. Positive and Proactive**

In dealing with this application, Haringey Council has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012 to foster the delivery of sustainable development in a positive and proactive manner.

### **2. DIRECTOR'S AGREEMENT LETTER**

This planning permission must be read in conjunction with the associated Director's Letter that secures financial and non-financial obligations.

### **3. CIL**

Based on the information given on the plans, the Mayoral CIL charge will be £ ( sqm x £72.73) and the Haringey CIL charge will be £ (sqm x £276.16). These rates are based on the Annual CIL Rate Summary for 2026 This will be collected by Haringey after/should the scheme is/be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the RICS CIL Index. An informative will be attached advising the applicant of this charge

### **4. Land Ownership**

The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.

### **5. Party Wall Act**

The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

### **6. Construction hours**

The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours:

8.00am - 6.00pm      Monday to Friday  
8.00am - 1.00pm      Saturday  
and not at all on Sundays and Bank Holidays.

**7. Street numbering**

The new development will require naming and numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 5573) to arrange for the allocation of a suitable address.

**8. Asbestos**

Prior to demolition of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

**9. Metropolitan Police Service Designing Out Crime**

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via [docomailbox.ne@met.police.uk](mailto:docomailbox.ne@met.police.uk) or 0208 217 3813.

**10. Crossrail 2**

Transport for London is prepared to provide information about the proposed location of the Crossrail 2 tunnels and structures. It will supply guidelines about the design and location of third-party structures in relation to the proposed tunnels, ground movement arising from the construction of the tunnels and noise and vibration arising from the construction and use of the tunnels. Applicants are encouraged to discuss these guidelines with the Crossrail 2 engineer in the course of preparing detailed design and method statements. The latest project developments can be found on the Crossrail 2 website [www.crossrail2.co.uk](http://www.crossrail2.co.uk).

**11. Thames Water - Strategic Water Main**

Should the development take place within 5m of the water main, the developer should contact Thames Water in relation to diverting assets / align the development, to prevent the potential for damage to subsurface potable water infrastructure.

**12. Thames Water - Water Network Upgrades**

Thames Water should be contacted in relation to any Water Network Upgrade works required to accommodate the additional demand to serve the development, as the

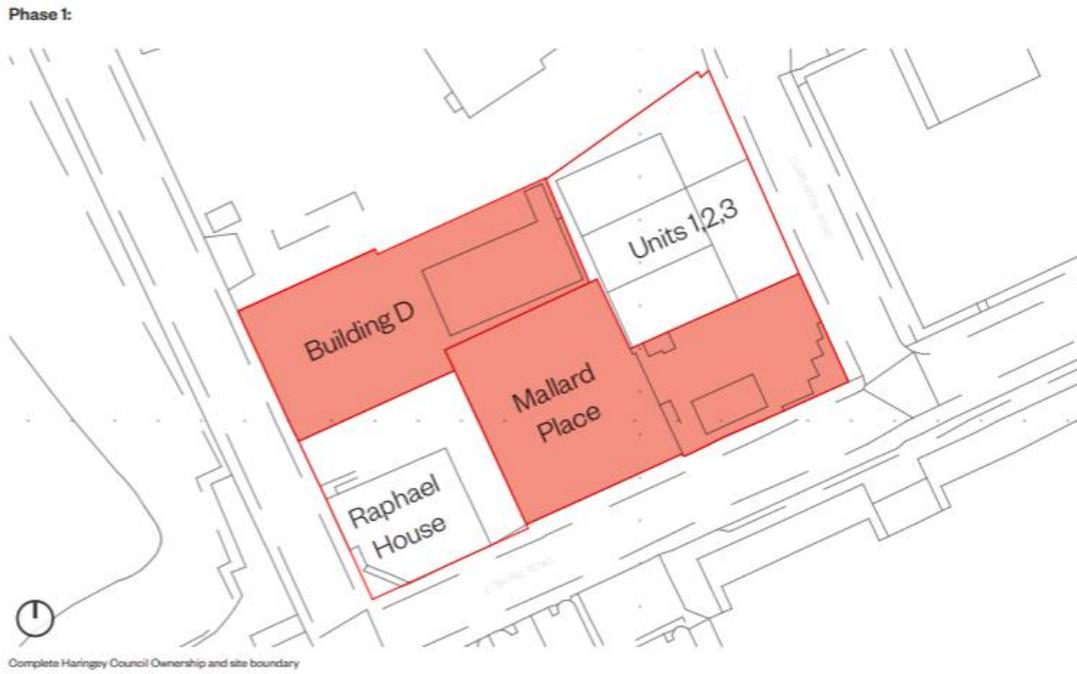
development may lead to no / low water pressure and network reinforcement works may be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

### **13. Water Consumption**

The residential units shall be constructed to meet, as a minimum, the higher Building Regulation standard Part G for water consumption, aiming to limit water consumption to 105 litres per person per day using the fittings approach. In the interests of water efficiency considerations.

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APPENDIX 2 – PLANS AND IMAGES



Site location plan



Birds eye view

# SITE ANALYSIS EXISTING CONTEXT



01. The Site: Raphael House and Chocolate Factory Phase I



02. The Site: Approach from Coburg Road and Units L2.3



Locating photos



03. Industrial Neighbours: Chocolate Factory Phase I refurbishment



04. Industrial Neighbours: Kingfisher Place, Parma House, Barratt's bldg



05. Further afield: View across the Waterworks



06. Further afield: Approach from Penstock Tunnel

Site analysis existing context

# SITE ANALYSIS EMERGING CONTEXT



01. Chocolate Factory Phase I proposed square



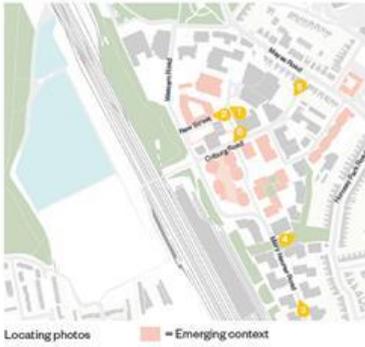
02. Completion of New Street as part of Chocolate Factory Phase I



03. Clarendon Gas Works Estate (Phase 2/3), Mary Nuener Road



04. Hornsey Park



Locating photos = Emerging context



05. Proposed Phase 4 of Clarendon Gas Works



06. Proposed Phase 6 of Clarendon Gas Works

Site analysis emerging context





Proposed first floor plan



Proposed second floor plan



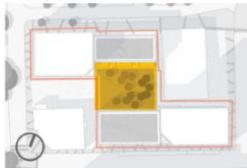
Mounded play feature



Seating and shared pathways for interaction



Planting character



Level 2 podium courtyard



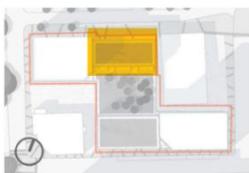
Proposed typical upper floor plan



Flexible, timber-stacked seating



Play, seating & growing space in a podium setting



Level 6 and 8 communal amenity space and green roofs



View along Coburg Road



View from the Penstock Tunnel route



View towards New Street



View of the 3 storey maisonettes from New Street





View towards the upper podium floor



Second floor podium



**APPENDIX 3 – CONSULTATION REPOSES – INTERNAL AND EXTERNAL**

Stakeholder	Question/Comment	Response
<p><b>Design</b></p>	<p><i>Full Planning Application for the demolition of existing buildings to deliver a new development comprising 150 new council homes (Use Class C3) and flexible workspace (Use Class E), erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing; alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.</i></p> <p>Applicant: London Borough of Haringey (Housing Procurement)            Agent: Icen Projects            Architects: Levitt Bernstein Architects</p> <p><b><u>Contents</u></b></p> <p>Principle of Development and Site Allocations ..... 14            Location and Neighbouring Sites ..... 15            Height, including Tall Buildings ..... 17            Form, Bulk &amp; Massing ..... 22            Urban Form &amp; Streetscape ..... 23            Elevational Composition, Fenestration &amp; Balconies ..... 25            Materials &amp; Detailing ..... 26            Private and Communal Amenity Spaces, including Children’s Playspace ..... 27            Residential Quality, including Aspect and Privacy ..... 27            Daylight and Sunlight ..... 29            Summary &amp; Conclusions ..... 32</p>	<p>Comments noted</p> <p>Conditions included</p>

	<p><b>Principle of Development and Site Allocations</b></p> <ol style="list-style-type: none"> <li>1. This proposal is for redevelopment of the site for the erection of a 22 storey building with 8 storey wing and a 14 storey building with 6 storey wing to provide 150 affordable social rent dwellings along with double height flexible workspace (539 sqm) The proposal will include a high-quality public realm with enhanced landscaping and amenity.</li> <li>2. Officers including this Design Officer, have been involved in intensive pre-application discussions on these proposals from the earliest concept design stages through to and subsequent to the submission of this planning application. Officers are generally satisfied with the quality proposed and responses to comments, although the rest of this document will go into detail on all the design issues relating to this proposal. These proposals have also had a thorough and ultimately supportive review by the council’s independent, objective, expert Quality Review Panel.</li> <li>3. The site is identified in an Opportunity Area as identified in the London Plan 2021 and is located in the Wood Green and Haringey Heartlands Growth Area as identified in the Council’s Local Plan 2017. The site is also located within the designated Local Employment Area; Regeneration Area and outside if but relatively close to the Wood Green Common Conservation Area.</li> <li>4. The site is part of SA19 “Wood Green Cultural Quarter (South)” in the Council’s currently adopted Site Allocation DPD as which seeks to enhance the Wood Green Cultural Quarter through improvements to Chocolate Factory and creation of high-quality urban realm and comprehensive redevelopment of the remaining sites for employment-led mixed-use development with residential. The principle of redeveloping this site – as a further part of SA 19, is welcomed and supported. The requirements for the site allocation are: <ul style="list-style-type: none"> <li>- Development proposals will be required to be accompanied by a site wide masterplan</li> <li>- The original Chocolate Factory building will be retained</li> <li>- Parma House, the Mountview academy building, the buildings fronting Coburg Road east of Clarendon Rd, and the extension to the Chocolate Factory will all be permitted for demolition, subject to alternative premises for viable uses to being retained and/or reprovided.</li> <li>- The development should demonstrate that the maximum quantum of employment floorspace has been provided subject to viability</li> </ul> </li> </ol>	
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	<ul style="list-style-type: none"> <li>- Uses that positively support the enhancement of the cultural quarter will be expected as part of any redevelopment</li> <li>- This site should preserve the setting of the adjoining Wood Green Common conservation area and its significance</li> <li>- In collaboration with neighbouring sites SA18 &amp; SA20, a coordinated approach will be sought to the provision of an enhanced public realm to be created in the north of this site, which will act as the focal point of the Cultural Quarter around Clarendon Road. Active frontages to both sides of Clarendon Road will be required, to contribute to this vision.</li> <li>- A public realm will be created that will act as the focal point for the Cultural Quarter in this the site around Clarendon Road</li> <li>- Active frontages to both sides of Clarendon Road will be required, which contribute to the cultural output of the area</li> <li>- Development should follow the principles set out in any future Council-approved masterplan, and the Wood Green AAP</li> <li>- Clarendon Rd will be enhanced and provide a north-south pedestrian and cycling connection through the site.</li> <li>- Affordable rent may be sought having regard to the viability of the scheme as a whole will be expected in this area in line with Policy DM38</li> <li>- This site falls within a Regeneration Area, and as such employment-led mixed use development will be appropriate here</li> <li>- Development should have regard to the adjoining site allocations (SA18 &amp; SA20) and follow the principles set out in any future Wood Green AAP</li> <li>- This site is subject to the requirements of Policy DM38- Employment-Led Regeneration.</li> </ul> <p>5. The council is now preparing a new Local Plan, which will incorporate new and updated policies and site allocations. The Council has recently completed its “Regulation 18” preferred options consultation, but it is still considered to have very little weight in planning decision making terms, albeit indicating intentions and direction of travel.</p> <p><b>Location and Neighbouring Sites</b></p> <p>6. The site consists <i>of most</i> of a rectangular city block, bounded by Western Road to its west, Coburg Road to its south, Clarendon Road to its east and an emerging new east-west street to its north, but although the council as a housing developer wanted to acquire the whole of this</p>	
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	<p>emerging city block, they has not been able to acquire freehold ownership of two corner sites within the “Mallard Place” block, known as “Raphael House” (taking up the south-western corner of the city block), and “Units 123” (in the north-eastern corner).</p> <ol style="list-style-type: none"> <li>7. The area in general consists of a host of designated Site Allocations which are earmarked for comprehensive redevelopment that will contribute to the regeneration of this growth area – there are a number of sites in this area that either have the benefit of planning permission for high density ‘tall’ buildings, some which are currently being developed – most notably the St. William Scheme and the Chocolate Factory.</li> <li>8. This particular site allocation SA19 also includes the corner plots that form the rest of this city block, as well as, Kingfisher Place, the new emerging block to the north, the original “Chocolate Factory” building to the north of that, some smaller parcels of land north and west of that building, and for a building east of the Chocolate Factory and of Clarendon Road, north of Kingfisher Place, known as Parma House. Planning permission was granted for this plot, known as “Land at Chocolate Factory and Parma House”, HGY/2017/3020 (approved 15/2/2019), by Barton Willmore architects for Workspace Group. This comprised detailed planning permission for about <math>\frac{2}{3}</math> of the site allocation, comprising of 10,657m<sup>2</sup> of commercial floorspace and 230 residential homes (Known as Chocolate Factory Phase 1), and a masterplan without floorspace for the remainder.</li> <li>9. For the site of this application currently being considered, in the Chocolate Factory planning permission known as Block D, the detailed portion covered just the north-western half, i.e. the corner of Western Road and the new street (itself created in that planning permission), extending along the south side of the new street to the back of the Units 123 plot, with a residential tower of 10 storeys (where 14 storeys are now proposed), and a 4 storey “tail” along the new street (where 6 storeys are now proposed). To its north, Plot E was to have been a complete perimeter podium residential block of 7 storeys, with flats over ground and 1<sup>st</sup> floor maisonettes with their own front doors off the street on its western and southern sides, the latter facing this application site across the new street, and employment units on the ground floor of its northern and eastern façade, the latter facing a central square, “Chocolate Square”, bound by the side of Units 123, the side of Kingfisher Place and the other Chocolate Factory development sites.</li> <li>10. Subsequent to permission being granted, Block D and <math>\frac{2}{3}</math> of Block E were sold to The Council, who have built out Block E in accordance with that permission, including parts of the new street, whilst Workspace have built out most of the original Chocolate Factory (“Block A”) and</li> </ol>	
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its surrounding public realm, including part of the square, but have not yet commenced their remaining part of Block E; that permission nevertheless remains valid. The planning service has received no indications of development intentions for the two corner sites, with the Kingfisher site still at the very earliest stages of feasibility.

11. However, St Williams' Clarendon Square development, now known as Alexandra Gate, has progressed apace, with Reserved Matters approval for their Phase 4, immediately south-east of this application site, having been granted Reserved Matters Approval (HGY/2023/2357) January 2024 and subsequently recently amended (HGY/2025/2870), so that the tallest and nearest block will rise to 30 storeys (Block H1 according to their numbering), and a Reserved Matters Application for their final Phase 5, directly south of this site on the opposite side of Coburg Road, has now been submitted. This now proposes two blocks of 24 and 16 floors in the north-western and north-eastern corners of their plot (Blocks J2 and G2), with a two storey podium between, directly opposite this application site. Alexandra Gate has also undergone a transition as it has reached its northern end, from a predominantly brick based palette to a more "civic" palette containing light grey (H1) and even dark grey (G2).
12. Therefore, compared to the 2017 approved Chocolate Factory planning permission and masterplan, this application brings the proposals on this site more into compatibility with the more ambitious approved and under-discussion Alexandra Gate proposals, providing increased height, density and intensity of development, along with a more "civic", less brick-tones dominated material palette.

#### Height, including Tall Buildings

13. These proposals include the two tall buildings 14 and 22 storeys. The site is located within an area identified in both the adopted and draft new Local Plans as suitable for tall buildings, and as will be shown below, meets the detailed siting and design criteria in the current Local Plan. The principle of taller buildings on this site was also agreed in the original Chocolate Factory approval which included a 10 storey building on this site, as well as a taller 17 storey building deeper into the Chocolate Factory site.
14. Considering each relevant criterion from The London Plan (adopted 2021) tall building policy D9 and Haringey's tall building policy in SP11 of our Strategic Policies DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017):

	<ul style="list-style-type: none"> <li>• LP D9.B: “1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations. 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans. 3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans”. HGY SP11: “an adopted Area Action Plan or existing adopted masterplan framework for the site and surrounding area” - The site is within the areas of both the adopted locations suitable for tall buildings (Policy DM6 in the Development Management Policies DPD, adopted 2017), the preferred options consultation draft Wood Green AAP (2018), and in new draft Local Plan, as well as identified in the Haringey Urban Characterisation Study (2015), which all identify the western end of Coburg Road as suitable for tall buildings, without specifying precisely how high.</li> <li>• HGY SP11: <i>assessment supporting tall buildings in a Characterisation Study</i>” - The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this wider Wood Green-Haringey Heartlands major development area and specifically, that height should rise in this specific location, as one of four high points, marking the centre of the Heartlands regeneration area, the envisaged central town square and the western end of the new east-west route from the High Road to Heartlands, connected to the onward western route via the Penstock Tunnel to Alexandra Park. The Characterisation Study recognises that the railway forms a significant barrier and buffer between the two sides, with the much more sensitive west side of the railway being a much quieter, parkland dominated neighbourhood than the east, as well as the railway corridor being at its widest beside this part of Heartlands, giving a much greater distance, with the broad, wooded embankments providing further buffering between the two areas.</li> <li>• LP D9.C.1 a): “<i>development proposals should address ... visual impacts</i>” [long, mid &amp; immediate views]; HGY DM DPD DM6.B.a: “<i>Protect and preserve existing locally important and London wide strategic views in accordance with Policy DM5</i>” – A range of local, intermediate and long distance views of these proposals have been prepared by the applicants in consultation with Haringey design and planning officers, to officer satisfaction.</li> </ul>	
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	<ul style="list-style-type: none"> <li>• LP D9.C.1 b): <i>“whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding”</i>; These proposals will be capable of being considered “Landmarks” by being wayfinders or markers within the masterplan, closing vistas of Coburg Road and Western Road, marking a key crossroads on the two main north-south streets with Coburg Road.</li> <li>• LP D9.C.1 b): <i>“architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan”</i>; HGY DM DPD DM6.B.a: <i>“be of a high standard of architectural quality and design, including a high quality urban realm”</i>; HGY DM DPD DM6.C.a: - High quality design especially of public realm is promised in the proposals, as will be explained further below. They should also be capable of being considered “Landmarks” by being elegant, well-proportioned and visually interesting when viewed from any direction</li> <li>• LP D9.C.1 c): <i>“proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings...”</i> - Although the taller elements will be visible, distantly, from within Wood Green Common Conservation Area, it is agreed that no heritage assets nor their settings are affected by these proposals.</li> <li>• LP D9.C.1 g): <i>“buildings should not cause adverse reflected glare”</i> – these residential proposals are for masonry buildings with inset windows framed between brick and metal cladding projecting and recessed balconies which in addition to avoiding solar heat gain, should prevent any glare problem occurring.</li> <li>• LP D9.C.1 h): <i>“buildings should be designed to minimise light pollution from internal and external lighting”</i> – again, given they will be in domestic use and not all window should not be a concern.</li> <li>• LP D9.C.2 a): <i>“the internal and external design, including construction detailing, the building’s materials and its emergency exit routes must ensure the safety of all occupants”</i> – Second staircases have been included to both taller buildings, with separate entrances to the street, along with other work by the applicants team, in consultation with their specialist fire consultants, to ensure the proposals are in complete accordance with the latest building regulations, fire prevention, fire spread prevention and means of escape enablement recommendations.</li> </ul>	
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	<ul style="list-style-type: none"> <li>• LP D9.C.2 b): <i>“buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process”</i> – Servicing has been carefully thought about and designed with care, with ground and 1<sup>st</sup> (under podium) floor refuse, cycle and plant storage.</li> <li>• LP D9.C.2 c): <i>“entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas”</i> – The location of ground floor active town centre uses is primarily driven by the desire to attract more activity to the site; there is no concern with overcrowding.</li> <li>• LP D9.C.2 d): <i>“it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building”</i> – The council’s specialist Transportation Planning officers have been closely involved in every stage of the design of this project, the wider masterplan, the detailed design of earlier phases and the detailed design of this phase, and have covered all of these issues.</li> <li>• LP D9.C.2 e): <i>“jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area”</i> – The attraction of employment and town centre activities as part of this development is an intrinsic and important part of this proposal, which has been carefully designed to appeal to and be suitable for a wide range of likely employment and town centre uses. These detailed designs have been prepared in consultation with The Council’s Regeneration Officers with specialism in employment generation.</li> <li>• LP D9.C.2 f): <i>“buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings”</i> – Although tall, these proposals are not considered tall enough to interfere with aviation, navigation or telecommunication in any way, and are close to taller potential interferences, notably the Transmission Tower of</li> </ul>	
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	<p>Alexandra Palace. As a predominantly masonry set of buildings, with glazing shaded from the sun to avoid solar gain, there should not be any concern with solar glare.</p> <ul style="list-style-type: none"> <li>• LP D9.C.3 a): <i>“wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building”</i> – The applicants’ consultants have carried out extensive wind testing on computer and in laboratories, along with detailed daylight and sunlight assessment as detailed elsewhere.</li> <li>• LP D9.C.3 b): <i>“air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions”</i> – The site is not a heavily trafficked location, away from any immediately neighbouring busy roads or other pollution sources.</li> <li>• LP D9.C.3 c): <i>“noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building”</i> – There have been no suggestions that there would be any adverse wind generated noise around these proposed buildings.</li> <li>• LP D9.C.4 a): <i>“the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting”</i> – no cumulative issues considered relevant.</li> <li>• LP D9.D: <i>“Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London”</i>. – again, given they will be in domestic use, not relevant.</li> <li>• HGY DM DPD DM6.C.b: <i>“Consider the impact on ecology and microclimate”</i> - Consideration of impact on ecology and microclimate encompasses daylight, sunlight and wind, examined in detail below. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this is only likely to be relevant adjacent to open countryside, a large open space or open waterway, which is not the case here.</li> </ul>	
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15. The only existing residential buildings close enough to these proposed towers to have their amenity affected are the recently completed Nilgun Canver Court (formerly Chocolate Factory Block E) immediately to the north of the site but included along with this site in the approved Chocolate Factory planning permission. A number of approved proposed residential buildings are proposed in the Alexandra Gate development immediately to the south of this proposal but due to their advantageous alignment will not be adversely affected by this development. The QRP were explicit that they were *“comfortable with the proposed height and massing, which has been well tested with the emerging townscape cluster of taller buildings”*.

#### Form, Bulk & Massing

16. The proposals are essentially two blocks that contribute to a potential enclosed, complete perimeter block for this modest sized city block, leaving the two corner sites outside of the applicants' ownership which an obvious gap infill potential to effectively complete the perimeter block. That is not to say that the block widths would / could eventually form a complete, uninterrupted perimeter block, as officers and the QRP have frequently noted, and as the applicant has shown in their minimal masterplan proposals for the two corners out of their ownership, showing they could both accommodate a modest matching podium & slab block.
17. A more realistic proposition would probably be that should either of the owners of the corner plots want a residential led mixed use development of their plot, they would have a reasonable expectation of greater density, comparable with the density achieved in this proposal, and could well initially at least come forward with a proposal for another tall building. However, in design terms, and out of concern for impact on residential neighbours, including in this development if it were approved, it is unlikely a 3<sup>rd</sup> and 4<sup>th</sup> tall building in the city block would be acceptable.
18. A more reasonable expectation would be for the two corner plots to be developed as shoulders (slab blocks) that turn the corners. This would enable a more significant, and in all probability sufficient, development quantum, commensurate with this application proposal, and would contribute more effectively to reaching the desirable end-goal (form an urban design point of view) of a predominantly enclosed city block, whilst not completely enclosing the block, leaving at least a gap to the west, as officers and the QRP noted was desirable. In this respect it is therefore notable and welcomed that these proposals include blank party walls to the ends of the two deck access shoulder wings, against the boundaries of the corner blocks, but leave

“half a gap” for access between the sides of the two taller blocks and the boundaries of the corner blocks.

19. Height and bulk of individual elements reflect their location within their immediate street context, in both the towers and shoulder wings. This manifests in the tallest tower marking the key crossroads, of Coburg and Clarendon Roads, whilst the less important junction of Western Road with the new east-west street being marked with a less tall tower, and in the southern shoulder wing, along Coburg Road at eight storeys, the northern shoulder wing along the minor, residential-character, new east-west street at six storeys. It is further manifest in the taller tower and wing, on the major east-west and north-south streets, having a two storey, arcaded, architectural base, whilst the Western Road frontage and corner turning into the new street has a single storey architectural base. Finally the residential frontage along the new east-west street inverts the form, with no architectural base, but instead is grounded in the masonry frontage and front gardens of three storey maisonettes, with the open access corridors of three floors of deck-access flats above.
20. The proximity of the tallest tower of this development to the tallest tower of the St William development, immediately to its south, could be seen as problematic, and indeed the QRP requested (at an earlier stage of design development) that it be pulled further away. However, officers consider the relationship is not directly facing, but one of diagonals on opposite corners of a major crossroads, with this tall building directly facing, across the considerable width of Coburg Road (approx. 17m), a lower, 16 storey block in their Phase 5, and the north-south street, such that this will be visible for a considerable distance to the south up that key street. It will therefore fit into the “checkerboard” pattern of tall buildings alternating with lower buildings and open space.

#### Urban Form & Streetscape

21. The amount of active frontage achieved in this proposal is very impressive. It fronts onto Coburg Road, envisaged as the main east-west town centre / civic character “high street” of the Heartlands Growth Area, and onto Clarendon Road, envisaged as the main north-south, pedestrian priority, secondary town centre character street linking the two urban-character squares, Chocolate Square and Clarendon Square (names to be confirmed; but both are approved in detail and partially constructed) at the hearts of the two main developments.
22. Therefore, it is particularly welcomed that in this proposal the entire frontage onto these two consists of a columned, two storey arcade, with predominantly clear glazed “shop windows” to

	<p>two large ground floor workspace units, the generously proportioned main residential communal lobby and a smaller but still spacious lobby to the 1<sup>st</sup> floor workspaces. Only a comparatively small part of the ground floor frontage is taken up by plant requiring street access (an electricity sub-station) and access to refuse stores, whilst the whole of the 1<sup>st</sup> floor of the arcade will be fully glazed onto the 1<sup>st</sup> floor business units. The design of the arcade promises to be generous and uncluttered, with the columns and other arcade detailing in robust contrasting metallic materials.</p> <p>23. The north-western corner of this proposal, where it fronts onto Western Road and turns the corner into the new street (whose name is still to be decided), contains a further commercial unit on the Western Road frontage, and a large residential communal entrance lobby on the street corner. This is to be detailed as a still prominent and contrasting, but just single storey base, which can be considered appropriate to the reduced height here, with only the residential core entrance, right on the corner, and the commercial unit entrance, recessed, rather than a continuous arcade, but otherwise in materials and details to match the 2 storey arcade on the busier south and east frontages.</p> <p>24. Behind the residential core entrance, a stretch of single storey utilitarian and blank façade is necessary, as refuse stores and means of escape have to be accessed, before the changeover to ground floor front doors and windows to a row of three storey maisonettes, matching those already built and approved on the opposite side of the street, accepting the quieter, residential character of this street. The maisonettes are enlivened with angled recesses to their front doors, ground floor dining-kitchen windows adding passive surveillance and short front garden raised planters.</p> <p>25. The heart of the development will form a two-storey podium, which whilst distant from street frontages, will form a useful place to hide two storeys of “back of house”, including the large areas of necessary ground floor plant, and equally large areas of cycle storage required accommodated at 1<sup>st</sup> floor. Two controlled servicing access routes, a narrow path north of the taller tower, off Clarendon Road, and a wider path south of the lower tower off Western Road, provide, respectively; access to fire escapes and maintenance only; and covered access for all cycle parking (via a dedicated cycle lift) and all servicing / plant access.</p> <p>26. In this way, lively active street frontages will be achieved throughout this development, commensurate with the character and business of their respective street frontage. Ground level green landscaping to street frontages is appropriately minimal, except along the more residential new street, whilst the development and street frontages will benefit from more</p>	
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generous increased pavement widths and new street trees provision achieved in the St William development on the south side of Coburg Road and existing magnificent mature trees on the west side of Western Road.

#### Elevational Composition, Fenestration & Balconies

27. As mentioned above, street facing elevations to all blocks are carefully designed to be well proportioned to look attractive and appealing, with distinct bases, proportionate their overall height, to ground the buildings in their busy street settings. Above these they are designed with a distinct residential middle and into each tower a distinct “crown” to the top floor. A rhythm of expressed vertical and horizontal banding break up the facades and relate back to the urban context, in particular picking up on the designs of neighbouring industrial buildings such as the Chocolate Factory.
28. Within this language, differences are expressed relevant to context, so that the taller tower, and its taller shoulder, onto the more prominent street frontages to Coburg and Clarendon Roads, have more prominent vertical bands, whilst in frontages to Western Road and the new street horizontals are more prominent. Private balconies are inset at corners of the towers, behind a deep loggia of columns extending the arcade rhythm along the Coburg Road shoulder, and to the podium in the northern shoulder, where an open framework for 3 storeys of communal access decks on the north side contrasts with the harder, masonry, lower 3 storeys of maisonettes.
29. Elevations to the podium, which are of lower height; four and six storeys, are more homely and designed to promote community interaction between balconies, access decks and the communal open spaces. But as the two towers rise above their shoulders, they both become 360° buildings, with a consistent elevational expression to all sides commensurate with their wider visibility. Finally end facades to the shoulders, where they are designed to potentially be built up against, are plain, but relieved by a checkerboard pattern in their brickwork, so that for as long as the neighbouring corner sites are left undeveloped these new buildings will not look ugly even here.
30. Window and balcony designs vary depending on whether they are on a vertical emphasis street façade, or a horizontal emphasis street façade (or internal to the podium). In the former, windows are generally floor to ceiling, divided into two or three panes, with Juliet balconies where required, whilst full-depth balconies have painted metal balustrades to match the windows and other contrasting elements. This gives the overall elevational composition an

emphatic vertical emphasis and sense of civic grandeur, whilst providing high levels of light and human scale to accommodation. Where the design emphasis is horizontal, though, the banding forms brick balustrades to balconies, albeit with a metal handrail / balustrading cap, whilst the windows are wider and shallower, generally of three panes. Throughout, all windows feature a deep, contrasting lintel, to contain integrated sun screening.

#### Materials & Detailing

31. A bold but simple materials palette is proposed to support and emphasise the proposed elevational composition, to give high durability, and an attractive, grand, civic appearance. The two main material choices are a white / light grey brick and contrasting fairly dark green materials, either glass reinforced concrete (GRC), metal or glazed brick, in the same tone of green. The green is used throughout the base; in the two story colonnade, in the single storey base, in maisonette ground floor features (all in GRC), in all doors, windows metal balconies and other balustrades and features forming the crowns to the taller tower.
32. The proposed brick, mortar and pointing, which will be subject to conditions requiring approval of physical samples, is intended to consist of two similar bricks, a “white” and a “white with grey accents”, sufficiently different to subtly pick out variations in vertical and horizontal banding, checkerboards and so on. It is intended that an essential warmth is brought to what could otherwise be rather plain and cold brick colours through warm, buff coloured mortar. Nevertheless, these light grey tones will complement the emerging civic character of the Coburg Road area of Heartlands, as also featured in recently approved and currently being considered reserved matters for the neighbouring St William development.
33. The proposed GRC will be a particularly durable and striking material to form the base of the buildings, particularly in hard-working and heavily trafficked areas. Complimented by accents of glazed brick, it should glow in sunshine and artificial light, adding a sparkle to the public realm. Matching green metalwork will extend this theme through the more brick dominated areas to the crown of the taller tower, with the more modest, lower tower, in a similar but more underplayed brick crown.
34. Deep green metal lintels to residential windows and patio doors will allow the incorporation of sunscreens to enable the proposed dwellings to benefit from prevention of overheating built in from the start, where overheating studies have shown these would be required (largely eastern, southern and western facades where not otherwise shaded). The roller shutters themselves will feature a checkerboard pattern, consistent with themes used throughout this

design, avoiding the detrimental appearance of plain, blank facades as often seen in buildings with roller shutters, and their boxing and mechanism will be fully concealed in the deep lintel detail.

#### Private and Communal Amenity Spaces, including Children's Playspace

35. All residential units are provided with private amenity space in compliance with or better than London Plan and Mayoral Housing SPG requirements, in the form of balconies or roof terraces. Balconies are generally inset, especially on street facing elevations, located on corners benefiting from daylight from and views in two directions, and usually benefit from direct sunlight.
36. All flats would also be able to use one of three private communal external amenity spaces; a large 2<sup>nd</sup> floor podium garden and two smaller private communal roof terraces, at 6<sup>th</sup> floor on the northern block and at 8<sup>th</sup> floor on the southern block. The podium will contain an equipped children's play area, seating both close to and separate from the play area and planters and would receive from some sunlight, although for longer, plentiful sunlight, residents will want to go to the higher roof terraces. Edges of the podium visible from the surrounding streets will see the trees and bushes and on the upper floor terraces contain landscaping to exploit the generous sun they will receive.
37. Nevertheless, these homes will benefit from less private communal amenity space and childrens playspace than some other developments, inevitably due to the nature of their being in the highest density, most urban part of the Heartlands Growth Area, with the most town centre character. Residents will still be able to enjoy the other large areas of publicly accessible recreation and playspace created by the new Penstock Tunnel Gateway Park immediately west of this site, the St William development's new public park, as well as nearby public parks at Wood Green Common and Alexandra Park, a 10-15 minute walk away along pedestrian friendly routes being improved as part of this and other neighbouring developments and containing further equipped children's playspace, sports pitches etc..

#### Residential Quality, including Aspect and Privacy

38. All flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected.

	<p>39. Entrances to and circulation within blocks is spacious and benefits from external windows providing a decent amount of natural light to some upper floor corridors. Each core has a prominently located street entrance, in highly legible and active locations, a fully glazed entrance hall, in attractive, durable materials, opening directly off the public street, leading through relatively short corridors to double stairs and double lifts. Every floor of both cores has less than eight flats per core per floor, the maximum recommended in the Mayors Housing SPG, with the towers having just four flats per floor.</p> <p>40. The proportion of single aspect housing is exceptionally low, with just one single aspect flat, where there is a 1<sup>st</sup> floor flat over ground floor refuse storage, facing the new residential street. This number is considered an exceptionally good achievement.</p> <p>41. With respect to privacy, as a development that is essentially a complete city block, excepting the two small corner plots, this proposal will not have any “back-to-back” relations to any existing or permitted neighbours, just across streets, where expectations of privacy are less, to the north to the recently completed homes in Nilgun Canver Court, across the new street, which will be approx. 14m wide, and to the south to the proposed St William development, approx. 17m wide, but for most of this elevation the loggia adds another 2m to the separation. Within the proposals, where there would be a back-to-back relation, and therefore a full expectation of privacy, the main concern would be across the podium garden, where the distance is approx. 19m. If and when any residential is approved on the corner plots, the layout of this proposal means it should be easy for them to avoid creating any overlooking situations.</p> <p>42. Traditionally it is considered that distances of 18 m are the maximum distance that a human face can be recognised, therefore distances of 18m or greater are considered to confer privacy. Therefore, only flats and maisonettes on the north side are close enough to any other dwellings for there to be any privacy concern, which could easily be remedied by residents using blinds or curtains as and when required, and 14m the distance is close to being sufficient on its own. However, it should also be remembered that this relationship is unchanged from the existing Chocolate Factory planning approval under which Nilgun Canver Court was built, which also had detailed planning permission for a very similar arrangement of housing in this location within this planning application.</p> <p>43. There are a few places where there could be some privacy concern for homes within this development from communal circulation and amenity areas; particularly for flats facing the podium, access decks and roof terraces. The flat and maisonettes on the north side of the</p>	
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podium have living rooms, with less privacy sensitivity, behind short private roof terraces, which residents can use to increase privacy if they wish. There is one bedroom facing the 6<sup>th</sup> floor roof terrace, and a living room and kitchen facing the 8<sup>th</sup> floor terrace, but both have a raised planting bed in front of them. As is usual, most of the deck access flats have one or two bedrooms facing the deck, usually their 2<sup>nd</sup> or 3<sup>rd</sup>, but decks only provide access to two or at most 3 other flats so this should be a lesser concern.

44. In general, the quality of residential accommodation proposed is consistently high, and the clear layout, generous, high quality and well naturally lit communal circulation and landscaped outdoor amenity space, and reasonable levels of privacy, especially considering it is in such a high-density location, further enhance the quality of accommodation proposed.

#### Daylight and Sunlight

45. Of relevance to this section, Haringey policy in the DM DPD DM1 part D.a. requires (and in Policy D2 parts C.(3)c. of the new draft Local Plan) that:

*“...D Development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours. The council will support proposals that: Provide appropriate sunlight, daylight and open aspects (including private amenity spaces where required) to all parts of the development and adjacent buildings and land; Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and residents of the development...”*

The applicants have prepared a Day and Sunlight Statement broadly in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice” (3rd Edition, Littlefair, 2021), known as “The BRE Guide”.

46. Daylight and sunlight levels to the proposed residential accommodation within this proposal generally meet the BRE standard, a good result for a higher density scheme. For daylight, 336 of the 447 proposed habitable rooms (75%) would receive daylight of or over the BRE Guide recommended levels. 62 of the 111 rooms that do not meet the recommended daylight levels are bedrooms, where the expectation of good daylight is lessened, and the 8 living rooms, 11 living-dining-kitchens and 11 kitchens that don’t meet the recommendations are often in rooms relying on windows opening off a balcony with a further balcony above, which itself will be of

	<p>greater benefit to residents. Nevertheless, given the higher density nature of this development area, the result is considered a good daylighting performance.</p> <p>47. For sunlight, 81% (122 of 150) of the units have habitable rooms facing within 90° of due south and 61% (92 units) have at least 1 room receiving the BRE Guide recommended 1.5 hours sunlight, of which 70 achieve the recommended sunlight levels. This is not such an impressive performance as for daylight, but it must be remembered that this is a high density, high rise development in a high density, high rise location.</p> <p>48. For outdoor spaces, all three communal amenity spaces exceed the BRE Guide recommended access to sunlight, of at least 2 hours at the solstice, with the podium and norther roof terrace receiving 3.5 hours and the southern roof terrace receiving an exceptionally good 6 hours. This indicates that while residents may not all receive recommended sunlight within their private flat, they have access to well sun lit private communal outdoor spaces. The results for the podium in particular counter officer and QRP concerns and indicate it has some “slack” to accommodate reasonable development on the two corner sites whilst remaining reasonably sun-lit. All flats also benefit from a private balcony or roof terrace, most of which also receive more than the recommended sunlight.</p> <p>49. It is generally recognised, in published reports such as “Superdensity” (Recommendations for Living at Superdensity - Design for Homes 2007), that residents value sunlight to their amenity spaces more highly than to their living rooms, valuing the ability to sit outdoors in the sun, and to have a view from their living room, and if possible, from their flat entrance hall, onto a sunny outdoor space, whilst excessive sunlight into living rooms can create overheating and television viewing difficulties. Given that all residents will have access to sunny private communal amenity space, most with sunny private amenity space, and a reasonable number sun to their living rooms, the sunlight levels are considered acceptable.</p> <p>50. Regarding the impact of their proposals on neighbouring dwellings, the applicants’ consultants’ complex and detailed assessment considers the impact of these proposals on the existing homes in Nilgun Canver Court, the completed residential part of the Chocolate Factory planning permission of 2019, its potential impact on the unbuilt part of the remainder of that block, known as Block E1 in that permission, the converted and extended flats in Parma House, currently under construction, in part in place of Block B from the Chocolate Factory, the permitted Reserved Matters Approval scheme for Blocks H1-3 (Phase 4) of St Williams’ Alexandra Gate (formerly Clarendon Square) development and the emerging, as yet not submitted Reserved Matters proposals for Phase 5 (Blocks G, H &amp; J) of Alexandra Gate. The</p>	
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	<p>latter is the fruit of cooperative workshops between the applicants and design teams for this and those neighbouring developers to ensure minimal mutual harm to day and sunlight between the two neighbouring developments.</p> <p>51. Definitions of baselines are an added complexity in this assessment; it would not be reasonable nor in accordance with the BRE Guide to just compare these proposals with the status quo pro ante, the existing low density industrial buildings and empty sites cleared for development that make up parts of both this application site and potentially affected neighbours. Or instance, the extant, partially implemented Chocolate Factory permission for both neighbouring Block E1 and Block D on this application site form part of the baseline in terms of effect on Nilgun Canver Court (which was known as Block E2 in the Chocolate Factory permission).</p> <p>52. The applicants' consultants also note recent called in and appeal decisions that add further refinement to what should be considered acceptable levels of daylight; Monmouth House (D&amp;P/3698/03); Whitechapel Estate (APP/E5900/w/17/3171437), both of which support Vertical Sky Component (VSC) levels in the "mid-teens" in urban areas under regeneration, and; Buckle St. (APP/E5900/W/17/3191757) which makes an absolute loss of 3% VSC an additional absolute threshold of "noticeability" to the BRE Guide's 10%. Albeit that all three of these decisions are more than six years old, pre-dating the most recent revisions to the BRE Guide, which largely incorporates those rulings. The Mayor of London's Housing SPG (and those fairly recent called-in and appeal decisions) acknowledges in particular, the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city.</p> <p>53. Therefore, whilst the effect of these proposals compared to the existing clear and low-density context is of some significant reductions in daylight and sunlight to Nilgun Canver Court, compared to the reasonable cumulative baseline, only two windows would receive a significant reduction in daylight within the definitions of the BRE Guide, and there would be no significant additional sunlight effects. For Block E1 (as yet unbuilt but with extant planning permission), they find the majority of rooms and windows would still retain acceptable levels of day and sunlight.</p>	
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	<p>54. Overshadowing impacts on the existing podium garden, intended to be shared between Blocks E1 and 2 and completely enclosed by them, show that it will fail to achieve the levels recommended in the BRE Guide even before this proposal. However, it would receive decent sunlight levels in the summer months, from April thorough to August, both without and with this application. The proposed roof terrace on E1 and the proposed “Chocolate Square” public open space will continue to receive excellent levels of sunlight, well in excess of the BRE Guide. There would also be some loss of sunlight to an area of solar panels installed on a lower roof of Nilgun Canver Court, but the applicants’ consultants find this loss would only be marginal, compared to the reasonable baseline.</p> <p>55. Both St Williams’ sites are to the south of this application site, therefore sunlight considerations are not relevant, only daylight. For Alexandra Gate Phase 4 (also permitted but unbuilt), again the majority would be unaffected, although 29 windows (of 592 windows in this very large development) would have a reduction to daylight below recommendations in the BRE Guide, but these are generally in living rooms in the corner closest to this application site, with dual aspect, where the second aspect and room overall retains good daylight levels. For Phase 5, areas where the neighbouring applicant may find achieving acceptable daylight more challenging are described, but it should be possible in their detailed design, by increasing window sizes and detailing balconies, to reach generally acceptable levels for such a high-density development in urban location.</p> <p>56. In the case of higher density developments it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations, as Greater London Authority guidance acknowledges. The daylight and sunlight levels achieved in this proposed development, and the effects of this development on neighbouring existing, permitted and emerging developments and amenity spaces will generally, not always quite reach the recommended levels from the BRE Guide, written with suburban locations in mind. However, given that this is in the heart of one of Haringey’s most important and ambitious high density development areas and acknowledged locations where tall buildings are acceptable, this proposal has achieved a high quality of day and sunlight access.</p> <p><b>Summary &amp; Conclusions</b></p> <p>57. Overall, these proposals are in accordance with the adopted and emerging wider visions of The Council for this area, a key growth location in the borough, as well as with existing</p>	
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	<p>approvals and site allocations. Nor do they impede reasonable matching or similar complimentary development on neighbouring sites, including those corner sites within the same block. This is a location already agreed by The Council to be suitable for tall buildings, and all the adopted detailed planning policy considerations for tall building suitability are satisfied, in fully detailed designs for elegant and appropriate tall buildings with attractive crowns.</p> <p>58. The overall proposed form bulk and massing coherently supports wider neighbourhood transformation and appropriately prioritises more important streets in a well-implemented example of the popular perimeter block development pattern. In terms of urban form and streetscape the proposals achieve a very impressive amount of active frontage, with surreptitious yet efficient incorporation of back-of-house facilities.</p> <p>59. Elevational composition is great, with exemplary rhythm of banding and gradation of base, middle and top. Fenestration and balconies elegantly provide good living conditions and incorporate screening to combat solar gain and privacy. Materials and detailing promise to be excellent; coherent, robust, durable and consistent with the emerging “civic” character of the Coburg Road heart of Heartlands.</p> <p>60. Residential quality, including room, flat and private amenity space, aspect and privacy is superb, and whilst communal amenity and playspace within the development does not quite match guidance, this can be considered acceptable given plentiful, recently improved, accessible, nearby public spaces and facilities. Daylight and sunlight levels achieved to this and to neighbours remains reasonable, especially given the high density location.</p> <p>61. Overall this promises to be an exemplary, standout, superbly designed development, providing much needed affordable housing to a superlative quality and a landmark regenerative contribution to the transformative Haringey Heartlands masterplan.</p> <p><b>Richard Truscott</b></p> <p><b>an Design Officer</b></p> <p style="text-align: right;"><b>Urb</b></p>	
<b>Conservation</b>	The proposed scheme forms part of an emerging tall building redevelopment area, sitting to the immediate south of Wood Green Common Conservation Area, and the development site fronts both the Alexandra Palace and Park Conservation Area, as well as the Hornsey Waterworks Conservation	Comments noted

	<p>Area that are located to the immediate west of the Great Northern Railway Line just opposite to the proposed development.</p> <p>The development site also is in the setting of the Grade II listed Alexandra Palace and grade II registered Park and Garden, and the Grade II* listed Dominion Centre (former Gaumont Cinema). The locally listed No. 83 Mayes Road Duke of Edinburgh Public House, locally listed Cambridge House and locally listed houses along Tower Terrace are among those locally listed assets that have been identified and that are in the most immediate surroundings of the development site.</p> <p>The submitted Heritage Assessment cross-references the submitted townscape views that do not provide and the ZTV diagram provided as part of the HTVIA and does not identify any heritage harm to any of the statutory listed and locally listed assets that have been considered.</p> <p>It is however noted that the ZTV diagram does not include the heritage assets to be assessed for impact, therefore providing insufficient clarity about those 'hotspots' from which the proposed development could theoretically be seen in relation to heritage buildings, and no heritage-focused views of the identified assets in context with the proposed scheme have been provided. Also, in line with the GLA and Historic England approach, HIAs should not strike the planning balance between any harm caused and the public benefits of the proposed development: this is a matter for the Planning Statement and the decision-maker.</p> <p>Based on the very limited heritage information offered by the AVRs, and based on street views of the locally listed Cambridge House, the Duke of Edinburgh Public House, and Tower Terrace, it is evident that the proposed development will affect the built and visual setting of these assets, and the experience of these assets, by adding to the impact of those previously approved schemes that are illustrated in the submitted AVRs. The tallest building proposed will appear as an additional, yet competing and distracting built element located in the foreground of views of these local assets, especially in views of the Tower Terrace and of the Cambridge House as seen from the Wood Green Common in views across the Conservation Area. By acknowledging the pre-existing impact of approved high-rise development located in the setting of these heritage assets, it is concluded that, on balance, the impact of the proposed scheme would lead to a low level of less than substantial harm to the significance of the three local heritage assets. It is also considered unlikely that the proposal would affect the significance of the listed buildings considered for heritage Impact assessment due to the limited intervisibility between the sites. However, the AVR images show that the tallest building included in the proposed scheme would prominently intrude in views of the site from Alexandra Park and would breach the skyline in views from Alexandra Palace viewing platform</p>	
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	<p>but will not affect any LVMF strategic view. This impact caused by the tallest building here proposed will lead to a very low level of less than substantial harm to the significance of the Registered Park and Garden. Accordingly, these conservation comments do not strike any “internal balance of harm” to avoid both the potential “double counting” of benefits and the idea of equivalence between heritage harms and heritage benefits. Heritage benefits are public benefits which should be placed in the overall planning balance, and this application requires to engage with paragraphs 215 and 216 of the NPPF.</p> <p>It is noted that the proposed scheme will deliver 150 affordable housing units consisting of 100% social-rented homes with building comprised between 6 and 22 stores in height. It is also noted that the proposed heights are considered consistent with the emerging, neighbouring developments and are considered acceptable in this urban context; the promising quality of the proposed design is fully understood and is assessed in the Urban Design officer’s comments. The public benefits associated with the proposed development are fully acknowledged and will be appropriately considered as part of the planning determination process.</p>	
<p><b>Transport</b></p>	<p><b>Transportation Planning comments</b>  <b>HGY/2025/3217 – 1 Mallard Place, Mallard Place</b>  <b>Description</b>  This major application, HGY/2025/3217 – 1 Mallard Place, Mallard Place is for the demolition of existing buildings to deliver a new development comprising 150 new council homes (Use Class C3) and flexible workspace (750sqm) (Use Class E), erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing; alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.  The site is in a PTAL 4 and is located within Wood Green Outer Zone CPZ(Monday-Saturday: 8am-6:30pm). The site will expected to be car-free in its entirety (both residential and commercial purposes).  The Site is bound by Coburg Road to the south, John Raphael House (comprising Faith Miracle Church with residential flats above) and Western Road to the west, New Street which is partially built out to the north, and Clarendon Road along with light industrial units to the east.  <b>Location and access</b></p>	<p>Observations have been taken into account. The Recommend legal agreement clauses and conditions will be included in line with the planning obligations SPD</p>

This site is located to the western side of Wood Green High Road within the wider area of redevelopment for the Chocolate Factory site. To the eastern side of the site is Clarendon Road, the southern side Coburg Road, and Western Road abuts the western side of the plot. There are vehicular accesses off Coburg and Clarendon Roads to the plot.

The site has a PTAL value of 4. Wood Green Underground Station is a 9 minute walk away, and Alexandra Palace National Rail station a 10 to 11 minute walk away. Two different bus services are accessible within 6 to 7 minutes' walk of the site. There is reference to improvements to bus services that are forthcoming, related to re-routing of bus services 91/N91 and the 232 via Western Road and Mayes Road respectively. Shopping and other attractions/facilities are within 10 to 15 minutes' walk of the site too. The associated connectivity improvements, including those for the Coburg Road corridor, the north-south link and improved bus services may result in an increase in the PTAL value for the site.

**Unit mix proposed**

150 residential units (of which 15 units are wheelchair accessible).

750sqm (GIA) – Class E flexible commercial/workspace.

The issues considered a part of our review of this planning application included: trip generation, impact of the trips on the public transport network (bus, rail and underground), walking routes (footways widths accessibility and accidents), an increase in cycling numbers an impact on the network, impact upon residential and commercial parking in the site vicinity, impact of the proposal on the highways network and the impact on the network resulting from construction/demolition traffic during the construction phase of the development proposal. Trip generation assumed for the AM (08:00-09:00) and PM (17:00-18:00) peak 30 trips, with the majority of trips (18/30) being made by bus of private car.

**Transport impact - trip generation and the Transport Assessment**

The applicant has provided a TRICs trip generation assessment in the Transport Assessment comparing the existing use against the proposed use. The existing use of 2,238sqm sees 748sqm used for Area 51 Education Ltd. This sees typically 40 learners and 20 staff/carers on site at any one time.

For the proposed residential use of the site (150 units), the majority of peak hour trips are forecast to be by on foot – AM peak (48/104) and PM Peak (24/74). Bus and underground make up a large proportion of the remainder of modal share.

For the proposed commercial/workspace (750sqm) 13 trips are forecast in the AM and PM peaks with all the trips forecast to be by public transport or active travel modes.

The proposed trip generation forecasts, support the fact that being in a PTAL of 4, the development trip generation reflect the close proximity of public transport nodes, Wood Green underground station, local bus stops and Alexandra Palace railway station. However, the forecasted cycling trip generation for the peak hour is somewhat low at 2 trips in the AM and PM peaks for the residential use. This is somewhat implausible given the provision of 275 residential long-stay cycle parking spaces to be provided. This needs to be revisited to provide a more realistic, working assumption.

In total in the AM Peak 117 two-way trips will be generated and 88 trips in the PM peak. Due to the site's location the vast majority of these trips will be undertaken by sustainable travel modes.

#### **Car parking**

2021 London Plan Policy T6: Car Parking, requires new residential and non-residential developments to be car-free when in a PTAL 4-6b. The site is in a PTAL 4 and located within a Controlled Parking Zone. Therefore, the applicant will be required to enter into a s.106 agreement prohibiting persons from applying for parking permits. The only exception to this will be for disabled residents and workers.

Due to space limitations with the site, it has not been possible to provide all the disabled/accessible parking bays on site. Instead the applicant has proposed on-street parking provision via 12 accessible parking bays located across the following locations: 5 on-street bays on New Street (controlled by the applicant), 2 bays within the Chocolate Factory Phase 1 E2 Car Park, 4 bays on Clarendon Road by repurposing 3 existing business permit bays to Western Road and 1 bay on Western Road. This is not ideal, since on-street disabled parking bays on the public highway are accessible to all blue badge holders, future residents may have to apply to convert these bays to dedicated disabled car parking bays.. The applicant has committed to monitor occupancy through the Travel Plan and has proposals for provision of additional disabled/accessible parking bays at the following locations 2 accessible bays on Coburg Road (once highways works are completed on Coburg Road), shifting existing residential and business permit parking further down Western Road to accommodate 1 or 2 accessible bays and re-purposing of a car-club bay agreed under a s.106 agreement for the Chocolate Factory phase 1 (which has not come forward) to an accessible bay. It is unclear from the Transport Assessment as to the triggers for provision of additional accessible/disabled parking bays. The trigger must be secured as part of the Car Parking Management Plan.

Pre-existing parking stress in the vicinity of the development site has been evaluated through a Parking Stress Survey to Lambeth Methodology (January 2025) which showed a worst case scenario of 78.87% parking stress and lowest stress of 50.7%. This shows that the site area has some spare capacity, below the 85% parking stress threshold.

Hence the reallocation of 2 pre-existing on-street parking bays for refuse collection purposes from the south tower are not envisaged to have a detrimental impact upon the parking stress of the area.

#### **Cycle parking**

The applicant is proposing 275 long-stay residential cycle parking spaces at 1<sup>st</sup> floor level over 7 bike stores (including an accessible bike store). These are to be accessed via 1 dedicated bike lift accessed from Western Road and a secondary/contingency lift (accessed from New Street) to maintain access when the primary one is not in use as per S4.7.4 of the Transport Assessment. This appears to be contradicted by S5.4.9 of the Framework Travel Plan which implies that the secondary lift is available on a continuous basis. Both lifts can accommodate standard and accessible/larger bikes, albeit no definitive capacity is given.

The applicant states, based on TRICs trip generation for the site, in the AM peak (08:00-09:00) 2 outbound and in the PM peak (17:00-18:00) 1 in and 1 outbound cycle journeys would be made. This seems somewhat low given the development size (150 units) and provision of 275 long-stay residential cycle parking spaces.

The applicant will need to give serious consideration as to how it could re-provide some form of dedicated cycle facility at ground floor, particularly in relation accessible cycle, the applicant will be required to explore other potential options for long-stay residential cycle provision, such as financial contribution to dockless cycle hire facilities, hangars, Brompton Lockers etc.

#### **Highways works**

The applicant has committed in its Transport Assessment to remove the vehicular access on Clarendon Road, reinstate the full kerb, and footways, carriageway realignment to great new wheel accessible car parking spaces on street. The applicant will be required to enter into a s278 agreement to secure this work. This is in addition to s.278 obligations to make good any damage to the highway and footways abounding the site incurred as a result construction and demolition works and agreed s.278 minor highways works enhancements to support active travel around the site perimeter.

#### **Servicing and Delivery Management Plan**

The applicant has provided a detailed Servicing and Delivery Management Plan to mitigate the impact of servicing and delivery associated with the site. This is both on a temporary basis (should the

	<p>development be completed before New Street is operational) and in the longer term/final arrangements.</p> <p>The servicing and delivery strategy for the site encompasses the following:</p> <p>A new inset loading bay is proposed on New Street which is controlled by Homes for Haringey. The loading bay will accommodate delivery vehicles and refuse collection, providing a safe and efficient arrangement to meet the servicing requirements generated by the development.</p> <p>For the southern block of the Site, refuse collection will be undertaken from Coburg Road. Circa 2 on-street parking bays would have to be suspended to allow for refuse collection from Coburg Road. Vehicles can access this location from both the east and west along Coburg Road and exit in forward gear.</p> <p>Refuse collection for the northern block will be undertaken from the proposed inset loading bay in the New Street. The first section of the New Street has been completed and the new street will eventually connect to Clarendon Road. Once complete, the New Street will work in a one-way arrangement and therefore the loading bay can be accessed and egressed in forward gear.</p> <p>Should the proposed development be occupied prior to the New Street being complete, a temporary refuse access arrangement has been agreed with LBH. Refuse collection vehicles would undertake a controlled reverse onto New Street from Western Road, under supervision. This would ensure safe operation during the interim period while the road remains incomplete.</p> <p>The proposed arrangements are acceptable, subject to further details specifying how safeguarding vulnerable road users when vehicles are having to operate in reverse gear and the length of envisaged time any temporary measures would be in operation.</p> <p>One outstanding issue is the forecast servicing and delivery trip generation for the residential element of this development. A daily forecast of 14 arrivals (13 LGVs) for 150 units is very low, given the increased propensity for online deliveries and supermarket deliveries. It is unclear as to what proposals will be in place to encourage trip chaining for servicing and delivery purposes. The applicant will be required to agree to enhance the existing Servicing and Delivery Management Plan.</p> <p><b>Site Access and wayfinding (Active Travel Zones)</b></p> <p>Within the Applicant's Transport Assessment it has undertaken a TfL Active Travel Assessment of 5 routes to/from the proposed development site. These consist of:</p> <p>ATZ Route 1: Noah's Ark Day Nursery Wood Green, Caxton Gardens, Station Road bus stops and Wood Green Underground Station.</p> <p>ATZ Route 2: Morrisons, The Community Hub and Wood Green Faith Mosque.</p> <p>ATZ Route 3: Faith Miracle Church, Alexandra Primary School, Barrat Gardens, Wood Green Common, New River Path, Avenue Gardens, Station Road bus stops and Alexandra Palace Rail Station.</p>	
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ATZ Route 4: The Mall Wood Green, Wood Green Library, Wood Green Town Centre, A105 High Road bus stops, Metro Bank, PureGym London Wood Green, The Gym Group London Wood Green, Cineworld Wood Green, Lidl and Barclays Bank.

ATZ Route 5: Penstock Tunnel, Penstock Path – Greenways, Campsbourne Community Food Garden and Alexandra Park.

From these routes, the applicant has identified potential active travel interventions that it could provide a s106 financial contribution towards investment, subject to NPPF considerations. The council welcomes these proposals, for inclusion into a s.106 agreement to enhance active travel infrastructure to/from the development site.

Additionally, the applicant will need to liaise with TfL and the council to agree on enhancing wayfinding, e.g. provision of a Legible London board near to the site through a s.106 funding. It will need to conform to TfL Yellow Book guidance.

#### **Travel Plan**

The applicant has provided a Travel Plan covering all uses for the site, both residential and commercial/business workspace. The plan should provide clear SMART (Specific, Measurable, Achievable, Relevant, Time-bound) objectives, which includes forecast modal shares for year 3, not just years 1 and 5.

Overall, LBH Transport Planning accepts the content of the document, though the area highlighted will need to be addressed for when a document is received as part of the S.106 planning obligation.

#### **Construction/Demolition Management Plan**

The applicant has provided a detailed Outline Construction Logistics Plan. This needs to be progressed further to a full Construction/Demolition Management Plan to be secured through a s.106 agreement. This is to ensure that the impact of both the construction and demolition phases is fully mitigated on both the local highway and transport network and the local community.

#### **Recommendation**

- (a) There are no transport objections to this proposal, subject to the following conditions, S.106 and S.278 obligations being agreed:

#### **Conditions**

The following conditions are required to be entered into by the applicant and the council to ensure that the transport impact of the development is mitigated on the highway/transport network and the local community.

##### **1. Servicing and Delivery Management Plan**

The applicant is required to provide a Servicing and Delivery Management Plan to ensure that servicing and delivery activity can be undertaken in a safe and effective manner.

No building or use hereby permitted shall be occupied or use commenced until a servicing and delivery management plan has been prepared encompassing all uses at the site. This should be submitted and approved by the Local Planning Authority. The measures shall thereafter be implemented in accordance with the approved servicing and delivery management plan for the lifetime of the development. The servicing and delivery management shall include the following:

- The contact details of a suitably qualified co-ordinator;
- How vehicle arrivals, departures, parking, stopping and waiting will be controlled to minimise any impact on the highway.
- Details of any freight consolidation operation, centre and the servicing and delivery booking and management systems.
- Measures to be implemented to avoid activity in high peak hours (08:00-09:00 and 17:00-18:00) and at school drop-off/pick-up times (08:00-09:00 and 15:00-16:00).
- Arrangements for accessing/egressing the site in forward gear and avoidance of having to transit roads in reverse gear.
- Detailing of measures to ensure that temporary servicing and delivery arrangements/emergency vehicle access are managed safely for all road users, should the site become operational before New Street is completed.
- Details of the capacity of the proposed new loading bay on New Street.
- Trip generation figures for servicing and delivery activity for the site, including existing trip generation to understand uplift in such activity. Trip generation, using TRICs should be disaggregated by usage. For the residential element of the development an appropriate uplift (to be agreed with the authority) to deliveries should be provided to reflect the growing propensity for home deliveries.
- Details of the refuse storage facilities on all plans (for both residential and commercial uses) need to show clearly the waste storage capacity.

Reason: To conform with London Plan Policy T7 Deliveries, servicing and construction. To ensure that the development does not prejudice the free flow of traffic or public safety along the adjoining highway and impact the local community,

**2. Cycle parking (Long and short-stay residential and workspace)**

	<p>The applicant is required to agree to a condition relating to the provision of long, short-stay cycle parking for both the residential and workspace land uses at the development. This should conform to 2021 London Plan standards and London Cycle Design Standards (LCDS).</p> <p>The applicant will be required to submit to the Highway Authority plans showing easily accessible (at ground floor level wherever possible); sheltered, weatherproof and secure cycle parking for 275 long-stay residential cycle spaces and short-stay residential spaces for approval. An absolute minimum of 20% long-stay residential cycle parking should be to Sheffield Stand design specification. The design specification and quantum of cycle parking should be clearly annotated on submitted plans. Appropriate provision of bespoke long-stay cycle parking should be provided where appropriate (depending upon the development type) to accommodate mobility impaired persons cycles, cargo bikes and e-bikes. Long-stay cycle parking should be easily accessible from the public highway, minimising transit time through sets of doors etc. Short-stay cycle parking provided should be in a central, easily accessible position to Sheffield Stand design specification.</p> <p>The applicant is required to investigate the feasibility of affording alternative residential long-stay cycle parking provision by exploring the following possible options (or other opportunities) and agree in writing with LBH any deviation from the London Plan standard:</p> <ul style="list-style-type: none"> <li>• Provision of long-stay residential cycle parking at ground floor level (at very least the accessible cycle parking).</li> <li>• Provision of a to be agreed proportion of dockless cycle hire cycles.</li> <li>• Provision of cycle hangars.</li> <li>• Provision of Brompton bike hire.</li> </ul> <p>An appropriate financial contribution towards provision of any of the above maybe sought by the authority.</p> <p>For the proposed commercial/business use at the development site, a total long-stay and short-stay cycle parking spaces should be provided to London Plan standards. Long-stay cycle parking spaces should be easily accessible, , weatherproof and secure. Wherever possible the design specification should be to Sheffield Stand. Appropriate changing/shower facilities and lockers should be provided for commercial/business users.</p> <p>Reason: To ensure that both residential and commercial/business use cycle parking is in accordance with the published London Plan 2021 Policy T5, the cycle parking must be in line with the London Cycle Design Standards (LCDS) and to promote active travel.</p> <p><b>3. Disabled/accessible parking bays</b></p> <p>The applicant has proposed 12 disabled/accessible parking bays primarily on-street. The applicant will need to agree to a condition to provide the following details:</p>	
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	<p>The applicant will need to show that the proposed on-street accessible parking bays will be able to accommodate a wheelchair accessing and egressing their vehicle in a safe manner and the process for managing the 5 applicant controlled bays on New Street. If any of the accessible parking bays are to have EV charging capability, the type of charging should be annotated on plans. The trigger point for providing additional disabled/accessible on-street parking bays should be specified and assurances provided as to safeguarding of road space to facilitate any future additional bays.</p> <p>Reason: To conform to 2021 London Plan Policy T6 Car Parking. To ensure that appropriate provision of disabled/accessible parking provision is provided for the site and to accommodate future growth.</p> <p><b>S.106 agreements</b></p> <p>The following S.106 agreements will be required to be entered into by the applicant and the council to help mitigate the transport impact of the development.</p> <p><b>1. Car-free development</b></p> <p>The owner is required to enter into a Section 106 agreement to ensure that the residential units and commercial/business usage at the site are defined as “car free” and therefore no residents or commercial/business users therein will be entitled to apply for a residents/business parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose. The only exception to this is for disabled residents and disabled workers at the site.</p> <p>Reason: To be in accordance with the published London Plan Policy T6.1 Residential Parking, Policy T6.2 Office Parking and to ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity.</p> <p><b>2. Car Parking Management Plan.</b></p> <p><u>The applicant will be required to provide a Car Parking Management Plan which includes but is not limited to:</u></p> <p>a) The applicant will need to show that the proposed on-street accessible parking bays will be able to accommodate a wheelchair accessing and egressing their vehicle in a safe manner and the process for managing the 5 applicant controlled bays on the New Street. The accessible parking bays will require EV charging capability, the type of charging should be annotated on plans and agreed by the highways authority.</p> <p>b) Monitor the take up of wheelchair accessible parking for the first 5 years of occupation in line with the Travel Plan monitoring, provide wheelchair accessible parking in line with the London Plan as required by residents of the development.</p>	
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Reason: To be in accordance with the published London Plan Policy T6.1 Residential Parking, Policy T6.2 Office Parking and to ensure that the development proposal is car-free and any residual car parking demand generated by the development will not impact on existing residential amenity.

### **3. Construction/Demolition Management Plan**

The applicant/developer is required to submit a Construction/Demolition Management Plan, 6 months (six months) prior to the commencement of development, and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover officer time required to administer and oversee the temporary arrangements, and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses.

No development shall take place, including any demolition works, until a full Construction/Demolition Management Plan has been submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered to throughout both the demolition and construction periods. The plan shall provide for the following:

- A construction/demolition programme including length and phasing of works;
- 24 hour emergency contact number;
- Hours of operation;
- Delivery hours (avoiding peak times on traffic sensitive routes (08:00-09:00 and 17:00-18:00) and school pick-up/drop-off times of Alexandra School (to be agreed upon in liaison with the school)).
- Expected number and types of vehicles requiring access to the site:
  - Deliveries, waste, cranes, equipment, plant, works, visitors;
  - Size of construction vehicles;
  - The use of consolidation operation/centre or scheme for the delivery of materials and goods.
  - Phasing of works and how the number of and types of vehicles requiring access to the site may vary.
- Means by which a reduction in the number of movements and parking on nearby streets can be achieved (including measures to ensure satisfactory access and movement for existing occupiers of neighbouring properties during the construction/demolition phases):

	<ul style="list-style-type: none"> <li>○ Programming;</li> <li>○ Waste management including using waste compaction;</li> <li>○ Construction/demolition methodology;</li> <li>○ Shared deliveries;</li> <li>○ Reverse/green logistics strategies to be employed;</li> <li>○ Car sharing;</li> <li>○ Travel planning;</li> <li>○ Local workforce;</li> <li>○ Parking facilities for staff and visitors;</li> <li>○ On-site facilities;</li> <li>○ A scheme to encourage the use of public transport and active travel.</li> </ul> <ul style="list-style-type: none"> <li>● Routes for construction/demolition traffic avoiding weight and size restrictions to reduce unsuitable traffic on residential roads;</li> <li>● Locations for loading/unloading, waiting/holding areas and means of communication for delivery vehicles if space is unavailable within or near the site;</li> <li>● Mechanisms in place to deal with unexpected/late delivery vehicles to minimise queuing impact and any idling on the highway network;</li> <li>● Locations for storage of plant/waste/construction/demolition materials;</li> <li>● Arrangements for the turning of vehicles, to be within the site to ensure access and egress from the site in forward gear (unless absolutely unavoidable and appropriate safeguarding measures for vulnerable highway users are in situ);</li> <li>● Arrangements to receive abnormal loads, unusually large vehicles, the delivery of cranes, portacabins and specialist plant;</li> <li>● Swept path analysis showing access for the largest vehicles expected to regularly access the site and measures to ensure adequate space is available;</li> <li>● Any necessary traffic management measures such as the suspension of parking, loading, one way working, footway and road closures, portable signals, stop &amp; go, lane closures, contraflow, priority working and give &amp; take;</li> </ul>	
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	<ul style="list-style-type: none"> <li>• Provision of sufficient advance forewarning to the council and local community of any required parking bay/footway/road closures and indication of the length of suspension;</li> <li>• Measures to protect vulnerable road users (cyclists and pedestrians) such as hoarding;</li> <li>• Measures to protect street furniture such as lighting columns and traffic signs;</li> <li>• Method of preventing mud and construction/demolition debris being carried onto the highway such as wheel washing facilities and ensuring construction/demolition vehicles loads are fully covered and secured when exiting/entering the site;</li> <li>• Membership of the Fleet Operator Recognition Scheme (FORS).</li> <li>• Meets the Construction Logistics and Community Safety (CLOCS) silver standard and demonstrates a commitment to strive to secure gold standard;</li> <li>• Methods of communicating the Construction/Demolition Management Plan to staff, visitors and neighbouring residents and businesses.</li> </ul> <p>The plan shall include a plan which identifies where required:</p> <ul style="list-style-type: none"> <li>• Hoarding lines with access gates (vehicle, pedestrian and cyclists).</li> <li>• Pedestrian, cycle and vehicle routing in to and within the site.</li> <li>• Temporary traffic management measures (including footway and road closures) and traffic marshal/banksman locations.</li> <li>• Locations for the loading/unloading, waiting/holding areas and storage of plant, waste and construction/demolition materials.</li> <li>• Crane and site welfare portacabin locations.</li> <li>• Parking (vehicle and cycle).</li> </ul> <p>Prior to the installation of traffic management measures on traffic sensitive streets the location, date and time must be agreed by the Highways Authority.</p> <p>The plan will be required to include a full highway condition survey prior to works commencing to ensure that damage to the footways and highways from the construction and demolition phases is made good (around the site perimeter). Development will not be permitted to occur (including investigation work, demolition, siting of site compound/welfare facilities and demolition) until a survey of the condition of the highway (including footways abutting the development site) has been submitted to and approved in writing by the Local Planning Authority (as part of the full Construction and Demolition Management Plan). The extent of the area to be surveyed must be agreed by the Highways Authority prior to the survey being undertaken. The survey must consist of:</p>	
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- A plan to the scale of 1:1000 showing the location of all defects identified on the highway and footways (including cycle lanes);
- A written and photographic record of all defects with corresponding location references accompanied by a description of the extent of the assessed area and a record of the date, time and weather conditions of the time of the survey.

No building or use will be permitted to be occupied or the use commenced until any damage to the highway by any traffic arising from the undertaking of the works at the development has been made good to the satisfaction of the Highway Authority.

Where structure(s) are adjacent to/within 6m of the highway/local authority maintained land the applicant will need to secure the required Technical Approval (TA) from the technical approval authority (TAA). No development shall occur, including (full or partial) demolition works of any existing building (s) or structure(s), until Technical Approval (TA) has been granted by the technical approval authority (TAA) based on submission (s) outlining how any structures within 6 metres of the edge of the highway (and outside of this limit where the failure of any structures would affect the failure of any structures would affect the safety of highway users) will be assessed, excavated, constructed, strengthened or demolished. Technical approval submissions shall be submitted in writing, and TAA approval, if granted, shall be in the form of a signed Design & Check Certificate (D&C) and granted in writing by the Local Planning Authority.

As part of the technical approval process a full structural report outlining how the demolition, excavation, design, strengthening and construction of structures will be managed to ensure during works temporary structural support is afforded and permanent support on completion of adjacent highway or locally maintained land where:

- The proposed location is within 6 metres of the edge of the highway or any local authority maintained and/or;
- The potential structural failure of any proposed structure(s) (if considered that the depth or extent(s) of the proposal(s) lie within the structural influence of the highway) would potential impact the highway or the safety of road users (particularly vulnerable ones).

Reason: To be in accordance with London Plan Policy T7 Deliveries, Servicing and Construction. To be in the interests of safe operation of the highway in the lead into development both during the demolition and construction phases of the development. To ensure the safety of vulnerable road users and the local community during the construction and demolition phases. To ensure that any damage to the adopted highway sustained throughout the development process can be identified and subsequently remedied at the expense of the developer. To ensure the works safeguard the structural

integrity of the highway and/or local-authority maintained land during the demolition and construction phase of the development.

**4. Framework Travel Plan**

A site-wide framework travel plan must be secured covering all uses by a S.106 agreement to help maximise public and active travel modal usage.

No building or use hereby permitted shall be occupied or use commenced until a Travel Plan (for all site uses) comprising immediate, contingency, and long-term measures to promote and encourage alternatives to single-occupancy car usage, along with the contact details of the current Travel Plan Co-ordinator and a copy of the Travel Information Pack, has been prepared, submitted to, and approved in writing by the Local Planning Authority. The approved Travel Plan shall be implemented, monitored and reviewed in accordance with the agreed Travel Plan targets to the satisfaction of the council. The Travel Plan shall be written in accordance with the sustainable development aims of the London Plan and TfL Travel Plan guidance.

Specific to the residential use at the site, the following measures should be included as part of the travel plan in order to maximise the use of public transport:

- (a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan interventions annually for a minimum period of 5 years.
- (b) Undertaking of resident travel surveys in years 1,3 and 5 to monitor and track progress of the travel plan in meeting and exceeding targets, with appropriate remedial measures in situ in case of non-compliance.
- (c) Provision of welcome induction packs containing public transport and cycling/walking information to every new resident, along with a £200 voucher for active travel related equipment purchases.
- (d) The applicant is required to pay a sum of £3,000 per annum for a period of 5 years £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan.

Reason: To adhere to London Plan Policy T4: Assessing and mitigating transport impacts. To enable residential and commercial users of the site to make an informed judgement about sustainable transport options, as part of measures to mitigate any net increase in trip generation associated with the new development.

**5. Pedestrian wayfinding to/from the site**

To encourage sustainable and active travel modal travel choices by users of the development the applicant will be required to provide a contribution towards the development and installation of wayfinding signage, we are therefore seeking a contribution of £50,000 (fifty thousand Pounds).

Reason: To conform to London Plan Policy T2 Healthy Streets. To promote active travel and wayfinding for residents and visitors to/from the site.

#### **6.Active Travel Zone Assessment**

The applicant as part of it's Transport Assessment has undertaken an Active Travel Assessment of routes to/from the development site. Within this, it highlighted several interventions that it would be prepared to make a s.106 contribution (subject to NPPF conditions being met) to enhance sustainable travel choices. To reinforce the TfL Healthy Streets at this development, the applicant is required to enter into a s.106 agreement, to provide a financial contribution for the following identified by the applicant from its ATZ:

1. In order to encourage active travel (cycling) to/from the site which affords 275 long-stay residential cycle parking spaces, the applicant should enter into a s106 agreement to enhance a short section of segregated cycle lane on the southern side of Mayes Road. The following works are required to be paid for by the applicant:
  - Resurfacing the cycle lane to enhance cracks and afford a smooth, even surface.
  - The entry point from the carriageway should be made flush to promote a safer and more comfortable transition for cyclists. The contribution is estimated at £120,000 (one hundred and twenty thousand pounds) towards the implementation of the new cycle route.
  
2. To enhance cyclist/pedestrian safety, at the 4-arm signalised junction of Station Road, A105 High Road, A109 Lordship Lane, the applicant in it's Transport Assessment proposed mitigation that could be secured via a S106 agreement. Specifically, the following measures were proposed:
  - Equipping the signalised crossing with a separate set of traffic lights for cyclists, to afford an early release phase ahead of general traffic, to improve their visibility and potential conflict with turning traffic.
  - Introduction of tighter turning radii on the Station Road arm to enhance road safety by lowering vehicle turning speeds and create a more controlled environment for road users.

	<p>We are seeking a contribution of £40,000 (Forty thousand pounds) towards the design and development of the improvement scheme.</p> <p>Reason: To conform to London Plan Policy T2 Healthy Streets. To encourage active travel choices to/from the development site.</p> <p><b>S.278 Agreements</b></p> <p>Given the increased footfall associated with the development, the applicant shall be required to enter into agreement with the Highway Authority under Section 278 of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. This is to be agreed in writing with LBH. For clarity purposes, this relates to streets/highways abounding the site boundary, i.e. Coburg Road, Western Road and Clarendon Road. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment.</p> <p>The applicant has committed in its Transport Assessment to remove the vehicular access on Clarendon Road and reinstate the full kerb. The applicant will be required to enter into a s278 agreement to secure this work.</p> <p>The applicant will be required to enter into a s278 agreement to make good any footway/highway damaged during the construction/demolition phase. For avoidance of doubt, the highway asset baseline shall be the highway and footways abutting the site contained here within the pre-commencement survey undertaken by the applicant and agreed with LBH as an acceptable baseline. The applicant will be required to submit detailed drawings of the highways works for all elements of the scheme including the details of the footpath, these drawings should be submitted for approval before any development commences on site.</p> <p>Reason: To implement the proposed highways works to facilitate future access to the development Site and to protect the integrity of the highways network.</p>	
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<p><b>Lead Pollution</b></p>	<p>.</p> <p>Having considered the relevant applicant submitted information including: Energy, Overheating and Sustainability Statement prepared by Etude, dated November 2025, taking note of the proposal to install Air Source Heat Pumps and Solar PV; Phase 1 Desk Study with reference 51148-CE-XX-XX-R-G-1001, prepared by Civil Earth, taking note of Section 2 (Site Context), 3 (Historical Development), 4 (Anticipated Ground Conditions), 5 (Environmental Setting), 6 (Preliminary Risk Assessment), 8 (Recommendations and Conclusions); Construction Dust Assessment with reference A5594/CDA/02 prepared by ACCON UK Ltd, dated 8 October 2025 taking note of Section 3 (Site Description and Baseline Conditions), 4 (Risk Assessment – Methodology) and 6 (Best Practice Mitigation); Air Quality Assessment with reference A5594/AQ/02, prepared by ACCON UK Ltd, taking note of Section 3 (Site Description and Baseline Conditions), 4 (Methodology), 5 (Impacts and Constrains of Air Quality) and 6 (Mitigation); Air Quality Neutral Assessment with reference A5594/AQN/02, prepared by ACCON UK Ltd, dated 5 November 2025, please be advised that we have no objections to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommended should planning permission be granted.</p> <p>1. Land Contamination</p> <p>Before development commences other than for investigative work:</p> <p>a) Using the information in the applicant submitted Phase 1 Desk Study with reference 51148-CE-XX-XX-R-G-1001, prepared by Civil Earth, a site investigation shall be designed for the site, using information obtained from the desktop study and Conceptual Model. The investigation must be comprehensive enough to enable: an updated risk assessment to be</p>	<p>Comments noted. Conditions /informative included</p>
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	<p>undertaken, refinement of the Conceptual Model, and the development of a Method Statement Detailing the remediation requirements. The updated risk assessment and refined Conceptual Model along with the site investigation report, shall be submitted and approved in writing by the Local Planning Authority.</p> <p>b) If the updated risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements and any post remedial monitoring, using the information obtained from the site investigation, shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. The remediation strategy shall then be implemented as approved.</p> <p>c) Before the development is occupied and where remediation is required, a verification report demonstrating that all works detailed in the remediation method statement have been completed shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety</p> <p>2. Unexpected Contamination</p> <p>If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.</p> <p>Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination</p>	
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	<p>sources at the development site in line with paragraph 109 of the National Planning Policy Framework.</p> <p>3. NRMM</p> <p>a. Prior to the commencement of the development, evidence of site registration at <a href="http://nrmm.london/">http://nrmm.london/</a> to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority.</p> <p>b. Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meets Stage IIIA of EU Directive 97/68/ EC for both NOx and PM emissions shall be submitted to the Local Planning Authority.</p> <p>c. During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.</p> <p>Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ</p> <p>4 Management and Control of Dust</p> <p>While we take note of the applicant submitted Construction Dust Assessment with reference A5594/CDA/02 prepared by ACCON UK Ltd, no works shall be carried out on the site until the specific locations of PM10 dust monitors and how these results will be made available to the Pollution for ongoing assessment has been submitted to and approved in writing by the Local</p>	
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	<p>Planning Authority. The works shall be carried out in accordance with the approved details thereafter.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control.</p> <p>5 Considerate Constructors Scheme</p> <p>Prior to the commencement of any works the site or Contractor Company must register with the Considerate Constructors Scheme. Proof of registration must be submitted to and approved in writing by the Local Planning Authority. Registration shall be maintained throughout construction.</p> <p>Reason: To Comply with Policy 7.14 of the London Plan.</p> <p>Informative:</p> <p>1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
Carbon Team	<p><b>Carbon Management Response 22/12/2024</b></p> <p>In preparing this consultation response, we have reviewed:</p>	<p>Comments noted. Conditions and legal agreement Clauses included</p>

- Energy, Overheating and Sustainability Statement\*
- Energy, Overheating and Sustainability Statement Appendices\*
- Embodied Carbon and Whole Life Carbon Statement\*
- GLA Carbon Emissions Reporting Spreadsheet\*
- GLA Whole Life Carbon Assessment Spreadsheet\*

All documents above were prepared by Etude (dated Nov 2025)

\* Information in relation to BREEAM is included in Sustainability and BREEAM pre-assessment is included in Appendix D.1 of Energy, Overheating and Sustainability Statement Appendices

- Relevant supporting documents.

### Summary

The development achieves a reduction of 66 % carbon dioxide emissions on site, which is supported in principle. Some clarifications must be provided with regard to the Energy Strategy, Overheating Strategy, Sustainability Strategy, Climate Change Adaptation and WLCA. Planning conditions have been recommended to secure the benefits of the scheme.

### Energy Strategy

The overall site-wide predicted reduction in CO<sub>2</sub> emissions for the development shows an improvement of approximately 66% in carbon emissions with SAP10.2 carbon factors, from the Baseline development model (which is Part L 2021 compliant). This represents an annual saving of approximately 89.43 tonnes of CO<sub>2</sub> from a baseline of 135.39 tCO<sub>2</sub>/year.

<i>Sitewide (SAP10.2 emission factors)</i>			
	<b>Total regulated emissions (Tonnes CO<sub>2</sub> / year)</b>	<b>CO<sub>2</sub> savings (Tonnes CO<sub>2</sub> / year)</b>	<b>Percentage savings (%)</b>
<b>Part L 2021 baseline</b>	135.39		
<b>Be Lean</b>	102.32	33.07	24%
<b>Be Clean</b>	102.32	0.0	0%
<b>Be Green</b>	45.96	56.36	42%
<b>Cumulative savings</b>		89.43	66%
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	45.96		

<b>Carbon offset contribution</b>	£95 x 30 years x 45.96 tCO <sub>2</sub> /year = £130,987
<b>10% management fee</b>	Plus £13,099

Part L 2021	Residential			Non-residential		
	Total regulated emissions (Tonnes CO <sub>2</sub> / year)	CO <sub>2</sub> savings (Tonnes CO <sub>2</sub> / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO <sub>2</sub> / year)	CO <sub>2</sub> savings (Tonnes CO <sub>2</sub> / year)	Percentage savings (%)
<b>Baseline</b>	133.7			1.73		
<b>Be Lean</b>	100.9	32.80	25%	1.46	0.27	16%
<b>Be Clean</b>	100.9	0.0	0%	1.46	0.0	0%
<b>Be Green</b>	44.56	56.30	42 %	1.40	0.06	4%
<b>Cumulative savings</b>		89.1	67%			19%

**Energy Use Intensity (EUI) / Space Heating Demand (SHD)**

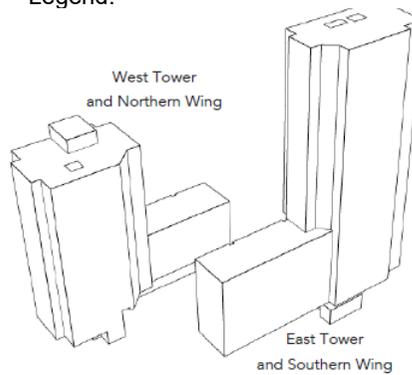
Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

This application has been modelled in the Planning House Planning Package (PHPP) software and the scheme has also been designed to Passivhaus standards, which is strongly supported. However the applicant has stated they can only decide at the end of RIBA stage 4 whether to process to formal certification subject to technical and financial viability.

In line with GLA's Energy Memo during pre-app stage, the applicant is strongly encouraged to achieve the full Passivhaus certification. As such a planning condition has been proposed accordingly.

	Proposed Development		GLA Benchmark
Building type	West Tower and Northern Wing *	East Tower and Southern Wing *	Residential
EUI	27 kWh/m <sup>2</sup> /year	32 kWh/m <sup>2</sup> /year	Meet GLA benchmark of 35/65/55 kWh/m <sup>2</sup> /year
SHD	10 kWh/m <sup>2</sup> GIA/year	11 kWh/m <sup>2</sup> GIA/year	Meets GLA benchmark of 15 kWh/m <sup>2</sup> /year
	15 kWh/ m <sup>2</sup> TFA/year	14 kWh/ m <sup>2</sup> TFA/year	Meet PHPP criteria of <15 kWh/m <sup>2</sup> TFA/yr
Methodology used	PHPP and SAP		

\* Legend:



### Energy – Lean

The applicant has proposed a saving of 33.07 tCO<sub>2</sub> in carbon emissions (24%) through improved energy efficiency standards in key elements of the build. This goes beyond the minimum 10% set in London Plan Policy SI2, so this is supported.

The following u-values, g-values and air tightness are proposed:

Floor u-value	0.085 W/m <sup>2</sup> K
External wall u-value	0.15 W/m <sup>2</sup> K
Roof u-value	0.10 W/m <sup>2</sup> K
Door u-value	1.0 W/m <sup>2</sup> K
Window u-value	0.8 W/m <sup>2</sup> K
G-value	0.5
Air permeability rate	1 m <sup>3</sup> /hm <sup>2</sup> @ 50Pa; Equivalent to 0.60 (West Tower and Northern Wing) and 0.45 (East Tower and Southern Wing)
Ventilation strategy	Mechanical ventilation with heat recovery Proposed model (Passivhaus Certified): Zehnder Q series unit with efficiency of 87-91%
Waste Water Heat recovery	Information not provided
Thermal bridging	Default values based on previous project Heat loss budget assigned to West Tower and Northern Wing is 5.0 kWh/m <sup>2</sup> /year; East Tower and Southern Wing is 4.6 kWh/m <sup>2</sup> /year
Low energy lighting	100% LEDs with an efficiency of at least 80 lumens / watt
Heating system (efficiency / emitter)	Not provided
Thermal mass	Medium
Improvement from the target fabric energy efficiency (TFEE)	19% improvement, from 26.97 kWh/m <sup>2</sup> /year to 21.80 kWh/m <sup>2</sup> /year

Actions:

- Please clarify what is the scope / boundary of the air-tightness test? Does it follow the thermal line and tested as a whole block as the section in page 35 implies?
- Please provide the target Psi values.

Overheating is dealt with in more detail below.

#### Energy – Clean

London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.

The applicant is not proposing any Be Clean measures.

The development is within 500 meters of a planned Haringey District Energy Network, but the development has not proposed a connection due to the uncertainty of the current delivery programme of the DEN. However the site will be future proofed to be compatible with a 4<sup>th</sup> generation low-carbon net network if it is available. A room for a future heat substation and a route to the edge of the site have been allowed to facilitate a future connection.

Applicant has explored the possibility of connection to neighbouring sites but decided not going forward as the systems are not compatible. The reasons are Chocolate Factory (Phase 1) Block E2 is currently heated by a gas boiler system and Gasworks development is pursuing individual low-carbon heating systems.

#### Actions:

- Applicant has referred to a set of MEP drawings submitted for the drawing showing a room for a future heat substation and a route to the edge of the site. However it is unclear where the drawing has been included. Please can applicant submit this drawing directly?

### Energy – Green

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The application has reviewed the installation of various renewable technologies. The report concludes that communal air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement. A total of 56.36 tCO<sub>2</sub> (42%) reduction of emissions are proposed under Be Green measures.

The solar array peak output would be 19.8 kWp, which is estimated to produce around 19,160 kWh/year of renewable electricity per year. The array of 44 panels would be mounted on a roof of East Tower, at a 15° tilt angle in a concertina arrangement.

The communal air-to-water ASHP systems will provide hot water and heating to the dwellings with floor temperature of 55-60C. The ASHP plant will be located on the roof of West Tower.

#### Actions:

- Please provide the equivalent carbon reduction in tCO<sub>2</sub>/year of the renewable electricity generated by the solar PV system.
- How will the solar energy be used on site (before surplus is exported onto the grid)?
- How much of the heating/hot water demand will be met by the proposed types of heat pumps? If this cannot be met fully, how will this be supplemented?
- What is the Seasonal Coefficient of Performance (SCOP), the Seasonal Performance Factor (SFP) and Seasonal Energy Efficiency ratio (SEER) of the ASHP?

### Energy – Be Seen

London Plan Policy SI2 requests all developments to 'be seen', to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

The applicant should install metering equipment on site, with sub-metering by dwelling/ non-residential unit. A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents/businesses.

Applicant has provided a preliminary strategy to set up metering for energy use monitoring and reporting.

Actions:

- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform>)

Carbon Offset Contribution

A carbon shortfall of 45.96 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years plus maintenance fee.

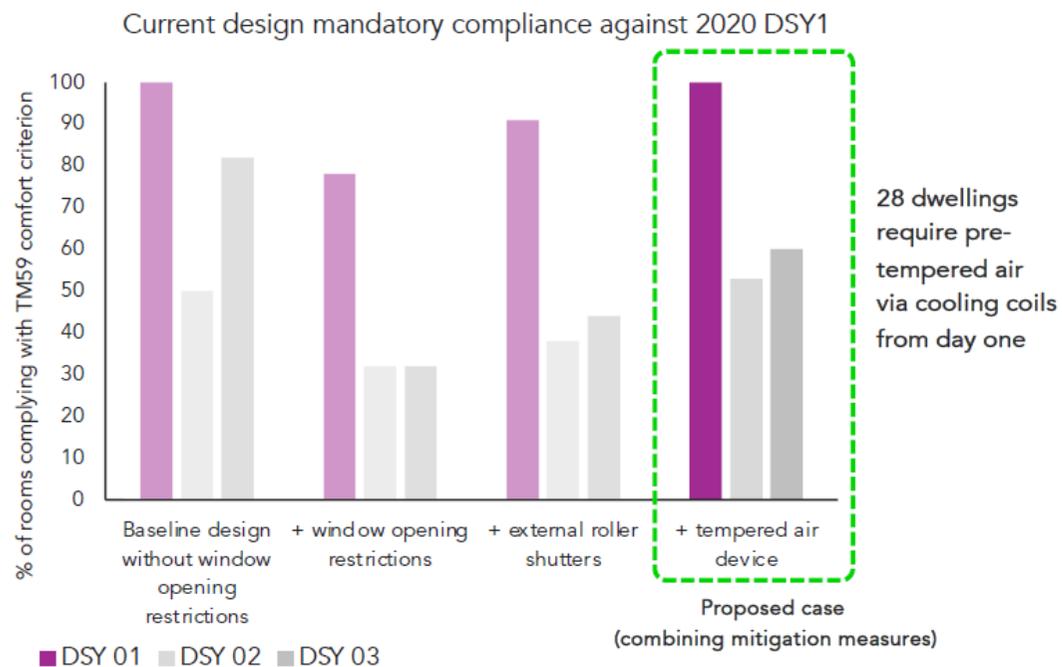
Overheating

London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM52 and TM59 with TM49 weather files, and the cooling hierarchy has been followed in the design. The report has modelled a sample of 21 dwellings and communal corridors under the London Weather Centre files. The sampled dwellings represent 101 dwellings, equivalent to 67% of the overall development (150 units).

The neighbouring development Clarendon Works Phase 5 is located to the South of site, it has an outline consented scheme with buildings of lower height and an emerging scheme with higher towers being proposed. Applicant has carried out the OH analysis based on the outline consented scheme to address a higher OH risk.

	<p><b>Residential – TM59:</b> Due to the noise constraints of this site being adjacent to the railway line, Western Road and Coburg Road (located to the west and south of the site) and security constraints for the dwellings in accessible locations, windows with different degrees of opening have been modelled in response to these constraints.</p> <p>The following scenarios have been modelled under 2020 DSY 1-3, 2050 DSY 1 and 2080 DSY 1 for predominantly naturally ventilated spaces:</p> <ul style="list-style-type: none"><li>• Scenario 01 – Baseline design without window opening restrictions</li><li>• Scenario 02 – Baseline design with window opening restrictions</li><li>• Scenario 03 – Scenario 02 plus external roller shutters</li><li>• Scenario 04 – Scenario 03 plus tempered air device</li></ul> <p>Results are shown in graph below (extracted from the OH analysis):</p>	
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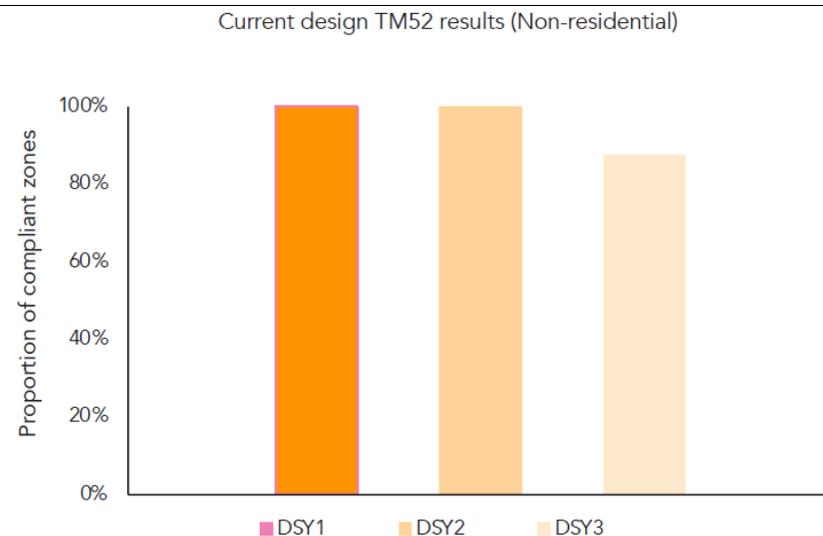
Graph showing residential full compliance against Part O / CIBSE TM59 overheating criteria using 2020 DSY1 London weather files.

Applicant has also run DSY1 2020 assessment with Clarendon Phase 5's emerging scheme and they have confirmed that all flats continue to comply with Part O using the same assumptions.

All spaces pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, with different degrees of opening in response to acoustic and security constraints
- Glazing g-value of 0.5 on all elevations
- Shading from external balconies
- External roller shutters to bedrooms as shown in the proposed elevations (modelled as fixed shading covering 80% of the window to allow natural ventilation through the remaining 20% gap)

	<ul style="list-style-type: none"> <li>- MVHR (0.55 ACH)</li> <li>- Cooling coils to the MVHR with 1kW cooling capacity 1kW tempered air coil added to the MVHR for 28 units</li> <li>- No active cooling</li> </ul> <p>Internal communal corridors in both towers were tested under 2020 DSY 1, both towers met the criteria maintaining internal temperature below 2C with increased ventilation rates of 0.25 and 0.45 ACH for the East and West towers respectively from baseline 0.1 ACH.</p> <p>Proposed future mitigation measures include:</p> <ul style="list-style-type: none"> <li>- To fully future-proof the development against 2020 DSY 2 and DYS 3, the scheme would require 1kW of pre-tempered to 126 apartments and 1.6 kW to 4 maisonettes. MEP design has been developed to accommodate these upgrades in the future.</li> <li>- Against hotter weather in 2050 and 2080, pre-tempering cooling coil can be installed to units where not previously present and a larger unit where a smaller one was previously included.</li> </ul> <p><b>Non-residential – TM52:</b> The non-residential spaces include the commercial unit and the workspace areas. These areas have been assessed under mechanically conditioned spaces.</p>	
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Graph showing proportion of spaces that meet the TM52 criteria for mechanically ventilated spaces for 2020 DSY1, DSY2 and DSY3 London weather files.

In order to pass the criteria of 2020s DSY 1, the following measures will be built:

- Building fabric as stated above
- MVHR and openable windows where possible
- VRF cooling system with cooling capacity of 75W/m<sup>2</sup>

The submitted overheating strategy is considered acceptable, subject to further clarifications (see actions below).

**Actions:**

- Please can you help to provide the actual percentages of spaces which pass TM59 criteria in 2020 DSY 1 for scenario 2 (window opening restrictions) and scenario 3 (external roller shutter)?
- Please confirm the percentage of dwellings where external roller shutters are required.
- Please confirm if the external roller shutter locations included in Appendix B.6 are only proposed where required? Or if the external roller shutters have been recommended to the entire bays of elevations for reasons of appearance and construction consistency?

- Why the external roller shutters have been proposed to the north elevations and to the units at lower levels where might be shaded by the neighbouring buildings?
- Are the proposed the external roller shutters electrically operated by individual tenants?
- DAS 8.8 has indicated the shutter maintenance strategy prioritises internal building access from windows, however replacement and cleaning will require external access so allowance is required for abseiling maintenance to some facades. Applicant should identify what maintenance can be done from the dwelling internally. Please provide further details including the required frequency of cleaning. This will be conditioned.
- Please confirm if it is 28 out of 150 dwellings that requires pre-tempering cooling coils.
- The applicant should also outline a strategy for residents to cope in extreme weather events, e.g. use of fans.
- The future mitigation measures have focused on the use of pre-tempering cooling coils. Please elaborate if other passive measures have been explored.
- Identify communal spaces (indoor and outdoor e.g. podium terraces) where residents can cool down if their flats are overheating.
- **Non-residential:** Please clarify if windows of the commercial units are openable and the openable areas have been maximised?
- Confirm who will own the overheating risk when the building is occupied (not the residents).
- This development should have a heatwave plan / building user guide to mitigate overheating risk for occupants.

### Sustainability

The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

A set of sustainability requirements for small non-residential spaces have been proposed, in lieu of BREEAM pre-assessment report for the commercial units.

The applicant has explained the proposed non-residential areas are relatively small (approximately 660m<sup>2</sup>) and are separated into a number of small units as flexible workspace. After carrying out an initial BREEAM pre-assessment report to identify the credits required to achieve a rating of “Excellent”, they have concluded the significant cost associated with meeting these requirements would be disproportionate to the minimal benefit achieved in terms of actual environmental performance.

However the applicant has proposed a set of sustainability requirements will be included as part of the Employer's Requirements, this is to ensure the appointed contractor will deliver the sustainable benefits following BREEAM's principle. This will be conditioned.

***Living roofs***

All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.

The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.

Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.

***Climate Change Adaptation***

Developments of this size should have a climate change adaptation strategy in place for residents and visitors to help the area become more resilient against the impacts of climate change. This should include adaptation to increased risk of flooding and wind-based impacts from more frequent and severe storm events, longer periods of drought (in relation to the soft landscaping and limiting occupant water use), more intense and longer heatwaves. The development should allocate publicly accessible 'cool spaces', following the [GLA's criteria for cool spaces](#) and to form part of the wider [cool spaces map](#).

Action:

- Identify in what ways the development and its landscape proposal will increase the resilience of residents and businesses and adapt their public realm to the impacts of climate change.

***Whole Life-Cycle Carbon Assessments***

Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	<b>Estimated carbon emissions</b>	<b>GLA benchmark RESIDENTIAL</b>	<b>Embodied carbon rating (Industry-wide)</b>
<b>Product &amp; Construction Stages</b> Modules A1-A5 (excl. sequestration)	709 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA benchmark (<850 kgCO <sub>2</sub> e/m <sup>2</sup> ) but misses the aspirational target (<500 kgCO <sub>2</sub> e/m <sup>2</sup> ).	Modules A1-A5 achieve a band rating of 'E', not meeting the LETI 2020 Design Target.
Modules A-C (excl B6, B7 and incl. sequestration)	1,049 kgCO <sub>2</sub> e/m <sup>2</sup> (excl contingency)	Meets GLA target (<1200 kgCO <sub>2</sub> e/m <sup>2</sup> ) but misses the aspirational benchmark (<800 kgCO <sub>2</sub> e/m <sup>2</sup> ).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'E', not meeting the RIBA 2030 Design Target.
	1217 kgCO <sub>2</sub> e/m <sup>2</sup> (incl contingency)	Misses GLA target (<1200 kgCO <sub>2</sub> e/m <sup>2</sup> ) and aspirational benchmark (<800 kgCO <sub>2</sub> e/m <sup>2</sup> ).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'F', not meeting the RIBA 2030 Design Target.
<b>Use and End-Of-Life Stages</b> Modules B6 and B7	5kgCO <sub>2</sub> e/m <sup>2</sup> *	N/A	
<b>Reuse, Recovery, Recycling Stages</b> Module D	-158kgCO <sub>2</sub> e/m <sup>2</sup> *	N/A	

\* Information extracted from the GLA WLCA assessment spreadsheet

	<p>The highest embodied carbon in Modules A-C is attributed to the superstructure (50%) and MEP (21%) and finishes (10%).</p> <p>The upfront embodied carbon of the scheme has been heavily influenced by a requirement to design around the Crossrail 2 exclusion zone that runs underneath the site. As a result, more significant groundworks and bulkier superstructure are required.</p> <p>Applicant has carried out option studies for concrete vs steel balcony frame and structural options for use of basement for attenuation, in both cases the lower embodied carbon options have been adopted.</p> <p>Separately, a breakdown by material type study has shown concrete, steel and cement are the largest contributions to upfront carbon emission. Applicant has highlighted the next steps are to refine WLCA and reduce the project's overall impact, these includes:</p> <ul style="list-style-type: none"> <li>• Replacing early-stage benchmarks with project-specific data</li> <li>• Optimising structural quantities</li> <li>• Improving concrete and steel specifications</li> <li>• Refining calculations against design team quantities.</li> </ul> <p>Overall, the side-wide WLC (Modules A-C) meets GLA target. However if included the design stage contingency as required by RICS v2, it is over the GLA target marginally. Overall it is considered acceptable especially taken in consideration of the impact of the structural design to avoid the Crossrail 2 exclusion zone.</p> <p><u>Actions:</u></p> <ul style="list-style-type: none"> <li>- Applicant to explain why the embodied carbons from B6 and B7 are so low.</li> <li>- Have applicant identified any project-specific opportunities to reduce WLC in later design stage?</li> <li>- Does the applicant know when the location of the Crossrail 2 will be finalised in relation to the design programme of the development? Any appropriate idea of quantity of embodied carbon could have saved if there is no requirement for a Crossrail 2 exclusion zone underneath the site?</li> <li>-</li> </ul> <p><b>Circular Economy</b></p>	
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Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

The principles used for this development are:

- Designing for longevity, circa 50 years of building life, and disassembly at end of life
- Designing for flexibility and adaptability of open spaces and commercial spaces
- Demolishing and recycling industrial/retail units
- Minimise operational waste and provide adequate space for recycling

Applicant has applied principles of CE for the following design decisions:

- The elevations are comprised of repeatable bays and a panelised system has been adopted for the facades. This improves the efficiency in material use and minimise waste during the manufacturing process.
- The structural grid options have been studied, the chosen grid has been sized to maximise flexibility for future modifications and structural efficiency.

The report sets out the Key Commitments (Page 2 of CE report). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.

Actions:

- The report has highlighted there is an existing high volume of concrete/ brick pavers, which can be repurposed within the site's landscape. Applicant to clarify if the landscape strategy has been proposed to reuse the existing material from site before it being downcycled into aggregate?
- Applicant has highlighted the use of lime mortar versus a cementitious mortar should be investigated. What is the strategy in place to ensure this will be investigated in the future design stages?

**Planning Obligations Heads of Terms**

- Be Seen commitment to uploading energy data
- Energy Plan

- Sustainability Review
- Estimated carbon offset contribution (and associated obligations) of £130,987 (indicative), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO<sup>2</sup> at the Energy Plan and Sustainability stages.
- A single point Future DEN connection (and associated obligations)

**Planning Conditions**

To be secured with amendments expected to the wording below once the revised information has been submitted.

- Energy strategy
- Sustainability Review
- Be Seen
- Overheating
- Building use guide
- Sustainability standards for non-residential units
- Living roofs
- Climate change adaptation
- Circular Economy (Pre-Construction report, Post-Completion report)
- Whole-Life Carbon
- Passivhaus certification

Energy Strategy

*The development hereby approved shall be constructed in accordance with the Energy, Overheating and Sustainability Statement by Etude (dated Nov 2025) delivering a minimum 66% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, Mechanical Ventilation and Heat Recovery (MVHRs), centralised air source heat pumps (ASHPs) and a minimum 19.8 kWp solar photovoltaic (PV) array and a single point future DEN connection.*

*(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:*

- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 24% reduction;
- Details to reduce thermal bridging;

- Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp) and annual energy generation (kWh/year); inverter capacity; and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions, if relevant;

*The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development.*

*(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.*

*(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.*

*(d) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.*

*Reason: To ensure the development reduces its impact on climate change by reducing carbon*

*emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.*

*Sustainability Review*

*Prior to the occupation of the relevant building, an assessment should be provided to be approved in writing by the Council which shall include an as built detailed energy assessment of the Development prepared in accordance with London Plan and Council policies which:*

- a. explains and provides evidence to demonstrate whether or not the Development has been constructed and completed in accordance with the Approved Energy Plan in particular whether the 100% CO2 emission reduction target has been met;*
- b. explains and provides evidence to demonstrate whether or not the Development following Occupation complies with London Plan and Council policies;*
- c. provides evidence to support (a) to (b) above including but not limited to photographic evidence, air tightness test certificates and as-built energy performance certificates; and*
- d. such other information reasonably requested by the Council.*

*Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.*

*Be Seen*

*(a) Prior to the completion of the superstructure a detailed scheme for energy monitoring has been submitted to and approved in writing by the Local Planning Authority. This shall include details of suitable automatic meter reading devices for the monitoring of energy use and renewable/low carbon energy generation. The monitoring mechanisms approved in the monitoring strategy shall be made available for use prior to the first occupation of each building.*

*(b) Prior to each Building being occupied, the Owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the 'As-built stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance.*

*(c) Within one year of first occupation, evidence shall be submitted to and approved by the Local Planning Authority to demonstrate how the development has performed against the approved*

*Energy Strategy and to demonstrate how occupants have been taken through training on how to use their homes and the technology correctly and in the most energy efficient way and that issues have been dealt with. This should include energy use data for the first year and a brief statement of occupant involvement to evidence this training and engagement.*

*(d) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).*

*All data and supporting evidence should be submitted to the GLA using the 'Be Seen' reporting webform (<https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energymonitoring-guidance>). ) If the 'In-use stage' evidence shows that the 'As-built stage' performance estimates have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.*

*Reason: To ensure the development can comply with the Energy Hierarchy in line with London Plan 2021 Policy SI 2 and Local Plan Policy SP4 before construction works prohibit compliance.*

*Overheating*

*Prior to the above ground commencement of the development, an updated Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk, confirm the mitigation measures, and propose a retrofit plan. This assessment shall be based on the Energy, Overheating and Sustainability Statement by Etude (dated Nov 2025) as a starting point, taking into account the outstanding requirements at application stage.*

*This report shall include:*

- Revised modelling of units modelled based on CIBSE TM52 and TM59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile with openable and closed window scenarios;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of crime, noise and air quality issues are mitigated appropriately evidenced by the proposed location and specification of measures by following the Cooling Hierarchy;
- Modelling of mitigation measures required to pass current and future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;
- Details of external roller blinds including dimensions and specifications, access and maintenance strategy;
- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:

- Openable windows;
- External roller shutters;
- Window g-values of 0.5;
- MVHRs (with cooling coils for specific dwellings where necessary)
- Hot water pipes insulated to high standards.
- Any further mitigation measures as approved by or superseded by the latest approved Overheating Strategy.

*Reason: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.*

Building User Guide

*Prior to occupation, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems for different heatwave scenarios. It should include details on the operation and the required maintenance of the external roller shutters. The Building User Guide should be easy to understand, and will be issued to any residential occupants before they move in, and should be kept online for residents to refer to easily.*

*Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.*

*Sustainability standards for non-residential unit*

*Prior to commencement on site for the non-residential units, evidence to demonstrate all Sustainability Requirements for Small Non-Residential Spaces as set out in Appendix D.2 of Energy, Overheating and Sustainability Statement Appendices (prepared by Etude dated Oct 2025) have been achieved and must be submitted to the Local Planning Authority.*

*Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.*

*Living roofs*

*(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:*

- i) A roof plan identifying where the living roofs will be located;*
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate*

- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with root ball of plugs 25cm<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
- vii) Management and maintenance plan, including frequency of watering arrangements.
- viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;

(b) Prior to the occupation of 90% of the dwellings, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

*Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*

Climate Change Adaptation

Prior to the commencement of above ground works, submit annotated plans and details on what measures will be delivered to the external amenity areas that will help adapt the development and its occupants to the impacts of climate change through more frequent and extreme weather events and more prolonged droughts.

*Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, and SI7, and Local Plan (2017) Policies SP4 and DM21.*

*Circular Economy*

*Prior to the occupation of each building, a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.*

*The relevant Circular Economy Statement shall be submitted to the GLA at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development].*

*Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.*

*Whole Life Carbon*

*Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.*

*Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.*

*Passivhaus Certificate*

*Prior to the commencement of construction works of each building, a Design Stage Passivhaus Strategy shall be submitted to and approved by the Local Planning Authority. This should show that a Passivhaus level space heating demand target of 15 kWh/m<sup>2</sup>/year is achieved, accompanied by Passive House Planning Package (PHPP) calculations.*

	<p><i>Within one month of completion of each building, a Passivhaus Certificate will be submitted for approval demonstrating that the relevant building meet the Passivhaus Standards, awarded by a suitably qualified independent Passivhaus Certifier.</i></p> <p><i>Reasons: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.</i></p>	
<p><b>Flood and Water Management</b></p>	<p>Comments dated 29/12/2025</p> <p>Having reviewed the applicant's submitted Flood Risk Assessment and Drainage Strategy document reference number 3765-CIV-XX-XX-R-C-30001 Revision P2 dated 5<sup>th</sup> November 2025 prepared by Civic Consultant, we have following comments to make on the above full planning application. :</p> <ol style="list-style-type: none"> <li>1) As a part of the Full planning application, we require full hydraulic calculations, including a network diagram cross-referencing all drainage elements. These should confirm simulation of a full range of rainfall events for each return period over 7 days and 24 hours using Micro Drainage or similar software. The results must demonstrate, No surcharging for the 1 in 1 year storm, No flooding for the 1 in 30 year storm, Any flooding during the 1 in 100 year storm (with climate change allowance) is safely managed in designated areas, away from sensitive infrastructure or buildings. (Appendix E and F are not comprehensive)</li> <li>2) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets.</li> <li>3) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge.</li> <li>4) Any overland flows generated by the proposed drainage scheme must follow existing natural flow paths. A plan should be provided showing these routes, demonstrating that they do not pose risk to properties or vulnerable development.</li> </ol>	<p>Comments noted Conditions included</p>

	<p>5) Details of the Management and maintenance plan for the installed drainage system in perpetuity as per the above</p> <p>I hope the above is helpful. Please do not hesitate to contact me should you require any further information.</p>	
<p><b>Trees</b></p>	<p>Comments dated 19/01/2026</p> <p>From an arboricultural point of view, I cannot support the above proposal.</p> <p>An arboricultural report has been submitted by Sharon Hosegood Associates dated October 2025. The report has been carried out to British Standard 5837: 2012 Trees in relation to design, demolition and construction- Recommendations</p> <p>The two high pollard mature London Plane trees, proposed for removal to facilitate the project, are category B trees and are worthy of a Tree Preservation Order for their high visibility, and amenity value.</p> <p>When standing back to view the trees the two canopies give the impression of one overall larger canopy.</p> <p>Our largest trees are our biggest assets providing visual amenity and ecosystem services. Plane trees have a good urban fitness, tolerate pruning, and restore their crowns quickly from reduction works.</p> <p>The immediate surrounding area is void of mature trees.</p> <p>42m to the east is the railway embankment forming a green corridor, east of that is 80 hectares of Alexandra Palace (Metropolitan Land, SINC, and Local Nature Reserve), to the north 230m is Wood Green Common with the magnificent avenue of Plane trees, further north (105m) of this is Palace Gates Nature reserve.</p>	<p>Comments noted Legal agreement secured</p>

It is vital to form links between these corridors by maintaining and increasing biodiversity.

The CAVAT value of the two Plane trees is £136, 270. The replanting plan is with small insignificant low impact ornamentals that do not meet canopy cover gain, wood volume, or CAVAT value.

No root protection area (RPA) has been shown in drawing SHA 261 TRP. Only the trees to be removed. We do not know what the percentage encroachment into the RPAs of the trees.

Direct damage to the planters can be addressed with solutions.

The design should be incorporated into a proposed layout that leaves this corner outside of the construction area (as below).

It is for the above reasons, that I cannot support the above proposal.



	<p><b>Comments dated 28/01/2026</b></p> <p>We are now in agreement that the proposed mitigating solution for the CAVAT loss (£136,270) for the mature London Plane trees proposed for removal, does appear satisfactory.</p> <p>If we can be allocated the full amount, this will allow us to potentially plant 80- 90 new standard sized trees (e.g. heavy standards and extra heavy standards). Alternatively, a smaller number of standards could be planted in various sites and some larger sized trees in suitable locations such as Wood Green High Road.</p> <p>All new trees can be planted within a 500-metre radius of the development site (see attached site plan for reference and an indication of roads and green spaces that will be considered).</p> <p>An aftercare and irrigation programme will be included for all new trees to establish their independence within the landscape. We will also plant a diverse range of tree species and those with larger canopies at maturity, where possible to increase canopy cover and mitigate the impacts of climate change.</p> <p>Please confirm that we can be allocated the full CAVAT loss amount through a S.106 agreement</p>	
<p><b>Waste Management</b></p>	<p>Formal Planning Comment – Waste Management (Approval Subject to Conditions)</p> <p><b>Application reference:</b> HGY/2025/3217</p> <p><b>Site:</b> Mallard Place (Chocolate Factory Phase 2), Wood Green, N22 6TS</p>	<p>Comments noted The Delivery and Servicing Plan condition will address waste collection concerns</p>

**Document reviewed:** Operational Waste Management Strategy (OWMS), Velocity Transport Planning Ltd, Nov 2025

I support the waste management approach **in principle** and raise **no objection**, subject to conditions securing final details. The submitted OWMS demonstrates that the development has been designed to accommodate segregated operational waste streams and collection arrangements, including dedicated residential waste stores serving each building, dedicated commercial waste stores, and a commitment that commercial occupiers will not present waste on the public highway.

The OWMS confirms that the residential system will provide on-site segregation of **residual (refuse)**, **dry mixed recycling (DMR)** and **food waste**, with residents taking waste to ground-floor stores and collection operatives moving containers directly to the refuse collection vehicle (RCV) loading position. This aligns with the Council's expectations that new developments incorporate integrated, well-designed recycling facilities and provide safe and efficient access for users and collection crews.

The proposed use of **1,100-litre Eurobins** for residual and DMR is consistent with the Council's communal metrics and is appropriately rounded up in the OWMS. The strategy also provides for internal segregation within dwellings via fitted kitchen bin arrangements, which is positive in supporting source separation and reducing contamination.

With regard to **food waste**, the strategy provides a separate stream and proposes storage in **140-litre wheeled bins**. Based on the operational arrangements described, I am content that the food waste allocation is acceptable in principle, provided the final management arrangements ensure there is no overflow and that capacity can be adjusted if required once the development is occupied. The OWMS commits to operational performance monitoring/reporting, which should be used to confirm sufficiency in practice and enable any post-occupation rebalancing of bin provision if required.

**Important clarification for the final strategy:** for **communal/high-rise residential collections**, the Council's standard service is **weekly collection for residual (refuse), DMR and food waste**. The

	<p>final OWMS should therefore confirm <b>weekly residual refuse collection</b> (and not fortnightly) for the communal system, as collection frequency underpins storage capacity and overflow risk.</p> <p>To ensure enforceable delivery, the following points should be secured at discharge stage: the OWMS should align explicitly with LBH standards for bin manoeuvring routes (step-free, smooth, and gradients consistent with LBH guidance) and be supported by detailed drawings/levels; and for the <b>Class E commercial/workspace</b>, the arrangements should demonstrate resilience (e.g., missed collection contingency) and confirm how occupiers/contractors will comply with workplace recycling separation requirements applicable from <b>31 March 2025</b>.</p> <p><b>Recommendation (Approval with Conditions):</b> Approve subject to conditions securing (i) a finalised Operational Waste Management Strategy confirming <b>weekly residential refuse collection</b> for the communal system, management responsibilities, and monitoring arrangements; (ii) detailed bin store layouts and access drawings demonstrating safe operation and compliance with LBH access standards; and (iii) a Commercial Waste Management Plan confirming separation compliance and contingency arrangements to prevent overflow and avoid any reliance on highway presentation.</p>	
<b>Noise Officer</b>	Having looked through the noise assessment I do not have any comments as the proposed data looks agreeable in my opinion.	
<b>EXTERNAL</b>		
<b>Thames Water</b>	<p>Waste Comments:</p> <p>Waste Comments: The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any</p>	Comments noted conditions and Informatives included

piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Please ensure to apply to determine if a build over agreement will be granted.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://www.thameswater.co.uk/help/home-improvements/how-to-connect-to-a-sewer/sewer-connection-design>

Thames Water would advise that with regard to the FOUL WATER network capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments:

Water Comments: The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the

asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be

occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://www.thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](https://www.thameswater.co.uk/buildingwater).

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at <https://www.gov.uk/government/publications/groundwater-protection-position-statements>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant. Supplementary Comments:

	<p>Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all piling and the clearance between the face of the pile to the face of a pipe. Without these drawings and cross-sectional details Thames Water will not be able to discharge your planning condition.</p> <p>Please provide and address the following:</p> <ol style="list-style-type: none"> <li>1. Development Layout Plan with OS Background</li> <li>2. Block Piling Layout Plan in relation to TWUL assets.</li> <li>3. Cross sectional Details to show proximity of proposed piles in relation to TWUL Assets.</li> <li>4. Piling method and pile type</li> <li>5. It should be specified on the development sketch how many stories each building has.</li> <li>6. Will a basement be constructed? Any basements intended to be constructed as part of the development, please clearly indicate the location and footprint.</li> <li>7. Submit a ground movement contour plot to prove our assets are not falling within the 1mm ground movement contour.</li> </ol> <p>Plans of Thames Water apparatus can be obtained through our website at <a href="mailto:www.thameswater@propertysearches.co.uk">www.thameswater@propertysearches.co.uk</a>. Please contact Developer Services if you wish to discuss further (email at <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> with email subject FAO DS- Major Projects Team. Please use the following reference in all future correspondence: DTS 79426.</p>	
<p><b>Transport for London</b></p>	<p>Comments dated 19/01/2026</p> <p><b>1 Mallard Place, Coburg Road - TfL's detailed comments</b></p> <p>Thank you for consulting TfL with regards to this referable planning application.</p> <p>I write to provide detailed strategic transport comments on this application reference 2025/3217. These reflect the matters raised in the GLA Stage 1 planning report GLA/2025/1008/S1/01 dated 12 January 2026. Please note that these comments are additional to any response that you may have received from colleagues within different parts of Transport for London (TfL).</p>	<p>Comments noted conditions included</p> <p>Recommend legal agreement clauses and conditions will be included</p>

	<p>The application seeks:</p> <p>Full planning application for the demolition of existing buildings on the site to deliver 150 affordable social-rented dwellings (Use Class C3) within buildings up to a maximum of 22 storeys, with 539sqm flexible workspace (Use Class E) on the ground and first floors.</p> <p>Site description and context</p> <p>The site is bounded by Coburg Road to the south and Western Road to the west and the ongoing construction of the Chocolate Factory site to the north. The nearest London Underground station is Wood Green which is approximately 700 metres to the north-east of the site. The nearest National Rail station from the site is Alexandra Palace which is approximately 800m to the north-west of the site. The closest bus stops are currently located on Station Road, approximately 300m to the north, serving two routes. There will be enhancements to the bus network – one extended route will serve Western Road and another will serve Coburg Road, including a temporary bus stand.</p> <p>The nearest section of the Transport for London Road Network (TLRN) is the A406 North Circular Road which is approximately 2.6km to the north of the site. The nearest section of the Strategic Road Network (SRN) is the A105 High Road Wood Green which is approximately 350 metres to the east.</p> <p>The Public Transport Accessibility Level (PTAL) of the site is currently rated as 4 (on a scale of 0 to 6 where 6 is excellent and 0 is very poor).</p> <p>Chocolate Factory consent and this application</p> <p>The Planning Statement sets out the relationship with the consented Chocolate Factory application, ref HGY 2017 / 3020, which included a building D which will come forward as part of this application. The applicant is reminded of the mitigation secured in that consent for a contribution to bus service enhancements and public realm, including £85,000 from the Chocolate Factory and £800,000 from the Haringey Heartlands consents.</p> <p>Crossrail 2 safeguarding</p> <p>Crossrail 2 team has responded directly on 4 December 2025 confirming that the application relates to land within the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. The</p>	
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proposal has taken into account the Safeguarding Direction, and conditions and an informative have been proposed by the Crossrail 2 team.

#### Trip generation and impact

The submitted Transport Assessment outlines the forecast travel demand, including a limited assessment of trip generation and mode share split. The TA sets out the impacts for only the AM and PM peak hours, and no assessment of trips across the three hour period. Based on the peak hour assessment, which show a net increase of 87 trips in AM peak hour and 58 in the PM peak hour, no significant additional impact is expected on the capacity of the local public transport network or local highway network to require a further contribution to network capacity beyond that already set out above.

#### Healthy Streets and Vision Zero

The TA includes an Active Travel Zone (ATZ) assessment for key journeys in the vicinity of the site for day-time and night-time which is welcomed. Items identified include tactile paving, pavement works, tree maintenance, and wayfinding to Penstock Tunnel, and lighting on New River Path to improve feelings of personal security and safety. The assessment and commentary appear to minimise the need for public realm and highway improvements.

As noted above, this development will form part of the cumulative impact of the Chocolate Factory and Haringey Heartlands schemes, where other contributions to highways and public realm were secured. A study has been completed for Haringey Council to establish Coburg Road as an active travel corridor to improve cycle accessibility where works in kind or contributions to the overall scheme should be secured through an appropriate highways agreement or legal mechanism.

There is ongoing work to improve local connectivity in the area, as referenced in Planning Statement paragraph 9.64, such as the Wood Green station to Highgate station via Hornsey station Cycleway route by Haringey Council, which will include improvements along Western Road and New River Path via Penstock Tunnel

A S106 contribution (rather than from CIL contribution which is suggested in Transport Assessment paragraph 5.7.2) towards local connectivity and public realm improvements to be secured by

Haringey Council would be in line with London Plan Policy T2 Healthy Streets and D7 Public Realm to facilitate residents and visitors to the site making shorter regular trips by foot and bicycle.

Route 91 is due to serve stops on Western Road adjacent to the site. On the Western Road facade, it will need to be clarified with the applicant and Haringey Council and TfL about the location of the new southbound bus stop and the interface of the door to the commercial unit and the gate to the access (which will be used inter alia for bicycles and refuse bins) to avoid any obstruction on pavement and at the bus stop for the benefit of all users, and to ensure that there will not be requests to relocate the stop in future. The delivery of the southbound stop and any highway and pavement works will need to be clarified alongside any Construction Logistics Plan for this site. Construction hoardings and scaffolding may affect the amount of pavement space for a bus stop and pedestrians.

#### Cycle parking

For cycle parking, there are 275 residential and six commercial long stay spaces, and a combined total of eight short stay spaces, which meets London Plan minimum standards. It is welcomed that the proportion of parking includes five per cent accessible stands and 20 per cent Sheffield stands with the remaining 75% as double tier parking spaces, and that long stay parking at first floor level served by two lifts, and that proposals are in line with London Cycling Design Standards.

All details of long stay and short stay cycle spaces should be secured by condition to ensure that cycle parking complies with TfL's London Cycling Design Standards (LCDS) guidance and in accordance with London Plan Policy T5.B.

The nature of the public realm in the vicinity of the site may also allow for a space to be identified for dockless bicycle bays, subject to any agreement with Haringey Council how to manage space and redistribution requirements for dockless bicycles and to avoid impact on the site's public realm

#### Car Parking

The development is proposed to be car-free, and takes into account provision from the wider consented scheme. This scheme proposes the relocation of a car club bay to be repurposed as a disabled persons parking space, which would need to be secured through an appropriate legal mechanism.

	<p>The development is proposed to be car-free, and takes into account provision from the wider consented scheme. This scheme proposes the relocation of a Page 4 of 5 car club bay to be repurposed as a disabled persons parking space, which would need to be secured through an appropriate legal mechanism.</p> <p>All six spaces should be provided with active electric vehicle charging points from the outset, and the applicant should provide infrastructure in the event of additional car parking being required by eligible occupiers.</p> <p>All six spaces should be provided with active electric vehicle charging points from the outset, and the applicant should provide infrastructure in the event of additional car parking being required by eligible occupiers.</p> <p>There is a Controlled Parking Zone (CPZ) “WG” which operates from 0800 - 1830 and occupiers of the site – both residential and commercial - should be restricting from applying for on-street parking permits secured through an appropriate legal mechanism.</p> <p>Refuse, Deliveries and Servicing</p> <p>The TA set out the proposals and interfaces with the consented scheme, including a new loading bay on New Street. A full Delivery and Servicing Plan (DSP) and Waste Management Plan should be secured by condition, prior to first occupation</p> <p>Construction</p> <p>The applicant has submitted an Outline Construction Logistics Plan, which appears generally acceptable to TfL. The construction and need for hoardings and scaffolding and any vehicle access routes could have the potential to affect the proposed southbound bus stop on Western Road and the interim bus stand on Coburg Road. The operation of the bus network must not be affected, and construction vehicles must not wait in bus stops on Western Road. TfL will need to be consulted on detailed proposals for the CLP and will be pleased to discuss any options. A full CLP and Construction Management Plan (CMP) should be secured by condition and discharged in consultation with TfL, and be produced in accordance with TfL best practice guidance.</p> <p>Travel Plan</p>	
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A framework Travel Plan (TP) has been submitted. The Travel Plan should be secured, implemented and monitored as part of any Section 106 agreement

#### Summary

TfL has no significant objections to the principle of the proposed development however further work is required in relation to the following:

- Clarifying design and access to the scheme and interfaces with the proposed Western Road southbound bus stop
- Clarifying construction matters affecting bus routes, stops and stands in the vicinity of the site

Appropriate S106 obligations should be included in Heads of Terms, alongside any variations to the consented scheme:

- A contribution to active travel and local connectivity for pedestrians and cyclists
- Travel Plan
- Restrictions to car parking permits

Conditions should be secured for:

- Delivery and Servicing Management Plan
- Waste Management Plan
- Car Park Management Plan
- Details of long stay and short stay cycle parking and facilities
- Full Construction Logistics Plan and Construction Management Plan, to be discharged in consultation with TfL.

I trust this provides you with an understanding of TfL's current position on this application. Please do not hesitate to contact me should you have any queries.

Comments dated 27/01/2026

**Bus stop provision on Western Road**

The note helps to clarify a couple of matters, but any detailed discussion on location of southbound bus stop won't be just for TfL to consider, and I'll need to leave to Haringey officers to decide if there's anything as far as this application goes for any changes to the location of the already identified southbound bus stop and if or how that could be dealt with. It may well be that we're unable to meet in the time available. I gather that LB Haringey previously advised that these two bus stops could not be staggered.

I can't tell if there will need to be any S278 works or other agreements related to this application on the pavement or highway of Western Road which could be a mechanism to address any footway or pavement works which could include any detailed proposals for the location of the southbound bus stop.

It's helpful to clarify that the bin store is only for commercial Unit 1, and the site waste management strategy will need to ensure that bins moved to pavement do not obstruct the bus stop waiting area.

**Bus stops and Construction Logistics Plan**

The applicant response and approach to CLP is welcomed. The wording proposed at 2.14 in the note should be referenced in any planning condition – a few minor updates in underlined text. The condition should be discharged following consultation with TfL as well as Haringey Council.

- A commitment to prevent construction vehicles from stopping within the bus stops on Western Road and the bus stand on Coburg Road;
- A strategy to maintain an acceptable footway width on Western Road by the southbound bus stop for the duration of the construction programme (through a gantry or concertina barriers)
- Identify any pavement and highway works associated with the Proposed Development that will interact or affect the southbound bus stop.

**Other Haringey comments**

On the other comments which Haringey officers have helpfully raised, I've reviewed the applicant response, and have no other comments to make but will be happy to assist with any queries or review.

	<p>I understand why the applicant has been unable to provide cycle parking at ground floor level, however this might provide a perceived barrier to ease of access by bicycle for parking to be at first floor level. A contribution and / or works in kind to other highway and active travel improvements in the vicinity of the site would help to improve the conditions for cycling and active travel and should be secured.</p> <p>It appears that most of the matters could be secured through planning conditions.</p> <p>If there's any other planning obligations or conditions with which I can assist please let me know.</p>	
<p><b>Designing Out Crime Officer</b></p>		<p>Comments noted. Conditions/Informative included</p>



MORE TRUST | LESS CRIME | HIGH STANDARDS

**Planning Case Officer:** Valerie Okeiyi  
London Borough of Haringey  
Planning and Building Control  
6th Floor River Park House  
225 High Road  
Wood Green  
N22 8HQ

**Lee Warwick**  
Designing Out Crime Office  
Bow Road Police Station  
111-117 Bow Road  
Tower Hamlets  
E3 2AN  
Tel: 02082173813  
Email: Lee.J.Warwick@met.police.uk  
Your ref: HGY/2025/3217  
Our ref: NE9099  
Dated: 20/01/2026

**Re: Planning Application at:**

Mallard Place 1 Mallard Place Wood Green London N22 6TS

**Proposal:**

Full Planning Application for the demolition of existing buildings to deliver a new development comprising 150 new council homes (Use Class C3) and flexible workspace (Use Class E), erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing, alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.

Dear Haringey Planning,

Thank you for allowing us to comment on the above planning proposal, please find our representation for the above application to London Borough of Haringey

**Section 1 - Introduction:**

With reference to the above application, we have had an opportunity to examine the details submitted and would like to offer the following comments, observations and recommendations. These are based on relevant information to this site (Please see Appendices), including my knowledge and experience as a Designing Out Crime Officer and as a Police Officer.

It is in our professional opinion that crime prevention and community safety are material considerations because of the mixed use, complex design, layout and the sensitive location of the development. To ensure the delivery of a safer development in line with L.B. Haringey DMM4 and DMM5 (See Appendix), we have highlighted some of the main comments we have in relation to Crime Prevention (Appendices 1).

At this stage we have met with the original project Architects to discuss Crime Prevention and Secured by Design at pre-application stage to discuss our concerns regarding the design and layout of the development. There is mention of crime prevention and Secured by Design in the Design and Access Statement referencing design out crime or crime prevention. We request that the developer contacts us at the earliest convenience to ensure that the development is designed to reduce crime at an early.

At this point it can be difficult to design out fully any issues identified, at best crime can only be mitigated against, as it does not fully reduce the opportunity of offences.

Whilst in principle we have no objections to the site, we have recommended the attaching of suitably worded conditions and an informative. The comments made can easily be mitigated early if the architects and developer ensure the ongoing dialogue with our department throughout the design and build process. This can be achieved by the below Secured by Design conditions being applied (Section 2). If the Conditions are applied, we request the completion of the relevant SBD application forms at the earliest opportunity.

The project has the potential to achieve a Secured by Design Accreditation if advice given is adhered to.

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to

[met.police.uk](http://met.police.uk)

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**Section 2 - Secured by Design Conditions and Informative:**

In light of the information provided, we request the following Conditions and Informative:

**Conditions:**

- A. Prior to the commencement of above ground works of each building or part of a building, details shall be submitted to and approved, in writing, by the Local Planning Authority to demonstrate that such building or such part of a building can achieve **'Secured by Design' Accreditation**. Accreditation must be achievable according to current and relevant **Secured by Design** guidelines at the time of above grade works of each building or phase of said development.

The development shall only be carried out in accordance with the approved details.

- B. Prior to the first occupation of each building, or part of a building or its use, **'Secured by Design'** certification shall be obtained for such building or part of such building or its use and thereafter all features are to be retained.

**Reason:** In the interest of creating safer, sustainable communities.

**Informative:**

The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available **free of charge** and can be contacted via [docomailbox.ne@met.police.uk](mailto:docomailbox.ne@met.police.uk) or 0208 217 3813.

**Section 3 - Conclusion:**

We would ask that our department's interest in this planning application is noted and that we are advised of the final **Decision Notice**, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security and community safety in mind.

Should the Planning Authority require clarification of any of the recommendations/comments given in the appendices please do not hesitate to contact us at the above office.

Yours sincerely,

**Lee Warwick 1977CO**

Designing Out Crime Officer  
Metropolitan Police Service

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### Appendix 1: Concerns and Comments

In summary we have overall site-specific comments in relation to the following items. This list is not exhaustive and acts as initial observations based on the available plans from the architect and local authority planning portal.

It has been noted that there has been a meeting with minutes and recommendations documented by the architects which facilitate early pre-application advice given by our department. Should this advice be taken, then SBD accreditation will be achieved.

Site specific advice may change depending on further information provided or site limitations as the project develops:

This list is not exhaustive and acts as concerns raised during consultation with the architects pre-application.

**Note** - That the pre-application phase concentrated on the design of the layout of the development, the following also provides the material aspect of the physical target hardening requirements to achieve Secured by Design accreditation and this has not been discussed in detail with the architects or developers.

Site specific advice may change depending on further information or site limitations as the project develops:

A- Boundary Treatment	
<b>Height</b>	Ideally side and rear boundary onto the public realm should be 2.4m (potentially 1.8m with 600mm trellis or 2.1m with a 300mm trellis). Any vertical transom (support) should be inward facing.
<b>Fencing Material Metal</b>	Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing.
<b>Railing Fencing</b>	All perimeter railings to have a maximum 50mm spacing centre to centre, be set flush to the front of any wall. If strengthened with mid rail must be designed to deter climbing and mid rail to be inward facing.
<b>Railing Fencing</b>	Any perimeter boundary treatment (railings) should be between 1.1m and 1.35m - ideally designed to provide visual permeability.
<b>Gating</b>	Designed level to the front building line, any locking mechanism, hinges to be anti-climb and fitted with a dampened stop. Gating to be inclusive of a self-closer and the same height as the perimeter treatment including any trellising.
<b>Recess</b>	Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm.
<b>Anti-Climb</b>	If anti-climbing measures are introduced then signage should be used to comply with Occupiers Liability Act 1984.
<b>Fencing Type</b>	Any boundary treatments should be UKAS certified as recommended by a DOCO
<b>Low Height boundaries</b>	All low defensive wall/railings to be designed to deter sitting, loitering and climbing.

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Access Control	
<b>Access Control</b>	Access control at the pedestrian gate is required to maintain security in communal areas. All panels to have audio/visual capability.
<b>Access Panel</b>	Access control panels (anti-vandal) should achieve the Secured by Design required standard – UL293.
<b>Trades Button</b>	<b>No Trades Button</b> on control panel
<b>Audio/Visual Entry (Camera)</b>	DDA (Part M) compliant camera alone is insufficient for first entry door. Primary camera location on access control panel to be considered to capture all visitors. Secondary camera will be required to the side/height that provides the resident a clear image of the visitor.
<b>Data Retention Fob Access</b>	Data retention of access control activations should be utilised throughout the site with the facility to store data for one calendar month before over writing. This data should be available to Police within 24 hours for evidential purposes should it be required. *Consideration to be given to appropriate and sufficient hard drive storage*
<b>Integrated (Part B/ ADQ) Compliance</b>	Access control systems should be integrated to utilise both fire and security systems.
<b>Emergency Release (Push To Exit)</b>	Pedestrian gate should be access controlled for both residents only
<b>Plant Room/ Service Rooms</b>	All service/plant door set/s accessible by public realm are required to be one of the following UKAS certified products subject to a crime risk assessment by a DOCC: LPS1175 issue 7 SR2 (or LPS 1175 Issue 8 B3) or STS202 Issue 3:2011 BR 2+ or LPS2081 SR2 B+ or Equivalent certification * Service/plant door/s should be self-closing, self-locking single doors*
<b>Pedestrian Gates</b>	Access controlled external pedestrian gates that provide entry to the development should be accredited to LPS1175 SR2 or equivalent and include Magnetic locks - 2 x 500kg (minimum) resistance (1200lbs/psi) placed a third from the top and a third from the bottom. Designed level to the front building line, be anti-climb and fitted with a dampened stop.
<b>Internet Of Things (IoT)</b>	Due consideration to be given to the security/risk management to access control systems dependent upon how they interact with IoT.

Fire Access - Gates	
<b>DropKey Protection Box(DPB)</b>	If the cause and effect of a fire over ride switch (FOS) activation poses a crime risk consideration to a Drop Key Protection Box should be made.  The project fire consultant should be made aware of any Part B Security v's Safety conflicts <a href="https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpb).aspx">https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpb).aspx</a>

Doors	
<b>Recessed Areas</b>	Any recesses should not exceed 600mm, but consideration can be given to the Disability Discrimination Act (DDA) requirements. Be advised further by borough occupational therapist.
<b>Accessible Doors Apartment and Townhouses</b>	All accessible residential Doors are required to be the following UKAS certified minimum standard: PAS24:2022 This includes sliding and bi-fold door sets not designated as the primary access/egress routes.
<b>Street Opening Front Doors</b>	Flat/Duplex/House front doors to meet a minimum standard of PAS24:2022 and ideally have a split spindle handle mechanism (requires key to gain access from outside of property) with internal thumb turn.
<b>Residential Door Fittings</b>	The security door viewer should be integral to the product specification. Awareness to DDA requirements for height and number of door viewers.
	The door chain or opening limiter should be affixed to the door set framing not cosmetic architrave. Any mail delivery letter plate with-in a PAS24:2016 door set should be compliant to TS008 and where possible incorporate and anti-fish cowl.
<b>Locks</b>	All locks are to be part of the accredited PAS24:2022 specification.

Postal Strategy	
<b>External Secure Mailboxes</b>	Secure mailboxes to serve each property should preferably be fixed to the external face of the building. External post boxes should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification.
<b>Internal Secure Mailboxes</b>	Secure mailboxes to serve each property should preferably be fixed inside the lobby and should be covered by CCTV and meet TS009 standards or MPS robust mailbox specification.

Windows	
<b>Accessible Windows &amp; Roof Lights</b>	All easily accessible windows (anything under 2m from another surface treatment) should be certificated to either: *PAS24:2016 with BS EN356:2000 min. P2A glazing (consider P3A) *STS204 Issue 6:2016, *STS202 Issue 7:2016 Burglary Rating 1 *LPS1175 Issue 7.2:2014 Security Rating 1 or *LPS1175 Issue 8:2018 A1 Security Rating 1 or *LPS 2081 Issue 1.1:2016 Security Rating A. Accessible windows includes any glass reached by climbing any number of floors via rain water pipes, balconies or via communal walkways (whether walkway accessed through secure door or not)
<b>Glazed Apertures</b>	All glazing in and adjacent to: *Residential, communal, front, back doors and ground floor windows *Communal windows that are easily accessible above ground floor level Should incorporate security glazing to the equal standard of the agreed door specification.
<b>Lockable Window Handles</b>	Any window within 2m of an accessible surface should have key operated locks. Where windows form an escape route, Part B (Fire) compliance should be adhered to. All ground

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

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	floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access.
<b>Access control</b>	
<b>Access Control Layers</b>	<p>Communal entrance to residents door –</p> <p>1<sup>st</sup> door Fob access for residents and Audiovisual access control for visitors with free movement in the lifts</p> <p>2<sup>nd</sup> lobby door ( on resident floor ) to be audiovisual ( preferred ) or audio access control for visitors with fob access for residents</p> <p>Access to cycle stores and podium be agree and must restrict access across the blocks ( with the exception of emergency egress)</p> <p>Stair cores are accessed via fob at ground floor with push to exit on each floor and fob onto the floor.</p> <p>All cycle and refuse stores to be accessed via fob</p>
<b>CCTV</b>	CCTV can be used to support access control measures where access is gained into communal areas such as the rear garden and the front area

<b>Cycle Stores</b>	
<b>External Cycle and Bulk Storage</b>	Positioned as not to provide climbing aids to other vulnerable areas such as accessible window/s, door/s, balconies, flat roofs and podiums.
<b>Cycle Storage Lighting</b>	Cycle storage lighting is required in all stores. In areas of no natural light or hours of darkness, a constant level of lighting is required for illumination. Connected lighting to provide low level lighting during inactivity and higher light levels when motion is detected.
<b>Signage</b>	No signage to be erected externally which would provide opportunity for offenders to identify cycle storage.
<b>Bicycle Registry Management</b>	Access to the cycle store should be prohibited. Only residents or users that register (name, address etc.) that information should be given access to the storage facility.
<b>CCTV</b>	CCTV must be installed in cycle stores in public areas. Should have unhindered views of the racking at all times and should be vandal resistant.
<b>Locking Points</b>	There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
<b>Viewing Panel</b>	Cycle store doors should allow light spill from with-in, either a small obscured viewing panel or robust louvre (as part of the door set).
<b>Internal Signage</b>	Ideally signage should be placed inside the store to reinforce importance of securing cycles

	by residents.
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**Balconies / Terraces & Door Canopies**

<b>Balconies</b>	Enclosures to balconies at all levels should be designed to exclude handholds and to eliminate the opportunity for climbing up, down or across between balconies. If a free standing/bolt on balcony system is to be used, consideration must be given to the risk posed by climbing. To prevent this the design should incorporating physical obstructions to frustrate the climber.
<b>Raised Planters</b>	Raised planters should be designed to avoid space beneath to store items such as drugs or weapons and so they do not provide climbing aids to vulnerable areas or balconies
<b>Door Canopies</b>	Where possible, door canopies should be free standing and offer no means of climbing. They also should be of lightweight construction that would not support a person if climbed. If canopy is robust enough to withstand a person standing on top, all nearby windows will be classed as vulnerable and therefore will be required to be PAS24 P2A.

**Lighting**

<b>Public Realm lighting</b>	Whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard.
<b>Declaration of Conformity</b>	Should be overseen by an independent and competent lighting engineer. They should be qualified to at least ILP Level 3 or 4 in line with the latest SBD guidance.
<b>Internal lighting</b>	Communal elements of any scheme, ideally should be a controlled by a photo electric sensor. This to ensure suitable levels of lighting at all times. Where no natural light is available two phased lighting can be used (low level for non-activity, higher level once movement is detected)
<b>Lux levels</b>	Lux is the measurement of light reaching a surface (1 lux is the light emitted from one candle that is 1m away from a surface 1sqm). Examples of suitable Lux levels are listed below: <ul style="list-style-type: none"> <li>• Office interior (security) 05 Lux</li> <li>• Private car parks 10 Lux</li> <li>• Exterior Rural location 10 Lux</li> <li>• Exterior Urban location 20 Lux</li> <li>• Walkways 30 Lux</li> <li>• Loading bays 50 Lux</li> </ul> Further guidance is available in the "Lighting against crime" manual.
<b>Uniformity (Uo)</b>	The even distribution of light across the area being illuminated. A good lighting system is one designed to distribute an appropriate amount of light evenly with uniformity and should include the following: <ul style="list-style-type: none"> <li>• Values of between 0.25 and 0.40</li> <li>• Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index.</li> <li>• Good lighting will use energy efficient lamps in suitable luminaries.</li> </ul>
<b>Dusk-Till-Dawn Lighting</b>	Lighting, where possible should consist of white light which is evenly distributed In Communal areas: <ul style="list-style-type: none"> <li>• All entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically.</li> </ul> On Residential units: <ul style="list-style-type: none"> <li>• All residential entrances (front, back, side doors) should also have dusk till dawn lighting, via a photo electric cell with a manual override. Allowing residents/the user local control.</li> </ul>

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<b>Bollard lighting</b>	<b>Is not permitted under the scheme</b> due to its history of vandalism and ease of being covered over. Up lighters and decorative lighting can be used but only in unison with columns providing the required standards of light for good clear facial recognition illumination.
<b>Directional lighting</b>	Can be used to support pedestrian routes. Should robust and vandal resistant and be part of an overall lighting strategy (as shown above) Directional lighting should not be a standalone solution to illumination.

<b>Gates</b>	
<b>Gate/s</b>	Ideally gated full height or with infill panels above. Access control and gate/s to be as close to the forward building line as possible. There should be minimal gap beneath the gate. Designed to deter or prevent climbing. House and Duplex gates to include Self closer on the entrance leading to the street door Any gate design to be submitted and approved by DOCO
<b>Ironmongery</b>	All gates should be fitted using anti tamper proof hinges. All hinges and brackets must be fitted in such a way so as not to create a climbing aid.
<b>Push to Exit</b>	Egress button to be minimum of 1.5 metres away from gate and fully shrouded. Any associated cabling to be out of sight.
<b>Pedestrian Gate/s</b>	Designed to deter or prevent climbing. All pedestrian gates to have a minimum of 2 x 500kg resistance magnetic locks. Ideally positioned 1/3 from top and 1/3 from bottom. To be single leaf, self-closing and self-locking.

<b>Climbing Points</b>	
<b>Rain Water Pipes</b>	External rain water pipes should be square/rectangular, flush to the wall or recessed – if round they should be shrouded up to 3m minimum from ground level and have close/flush fitting brackets.
<b>Balcony to Balcony vulnerabilities</b>	Consideration should also be given for opportunities to climb balcony to balcony both up and across Balustrade should be secured to the floor of the balcony and flush to the front removing any vulnerable grip points.
<b>Balconies and adjacent features</b>	Consider vulnerability of balconies by boundary walls along with <ul style="list-style-type: none"> <li>• Trees.</li> <li>• Door canopies.</li> <li>• Street furniture.</li> <li>• Neighbouring properties.</li> <li>• ACB and utility meters.</li> <li>• Any outbuildings such as cycle and refuse store.</li> <li>• Vehicles in parking areas.</li> </ul>

<b>Utility Meters</b>	
<b>Utility Meters</b>	All utility meters should be positioned where possible in external risers or cupboards removing the requirement for an official to enter the building to read them. Smart meters should be the default requirement for all developments.

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<b>Management Plan</b>	If utility meter is to be located within residential unit representatives must have a scheduled appointment made with the concierge or Management Company to gain access to the building.
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**Car Parking**

<b>Location</b>	Positioned as close as possible to buildings and overlooked by active windows. Should not be located close to boundary walls allowing vehicles to be used to climb into properties.
<b>Lighting</b>	Should be well lit to the latest standard of BS5489 (consider Park Mark guidance)  <a href="https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf">https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf</a>

**Alarm / C.C.T.V**

<b>Alarm Consideration</b>	If an alarm is to be installed should meet BS EN 50131 (as minimum) which can include wireless systems. If an alarm is not fitted installers should provide a labelled 13amp fused spur on consumer unit for future use.  <a href="https://www.policesecuritysystems.com/">https://www.policesecuritysystems.com/</a>
<b>CCTV Installation</b>	Please note where a development requires CCTV, this facility is to compliment other security measures, not to replace them. As a minimum police recommend coverage of the following areas: <ul style="list-style-type: none"> <li>* Entrance &amp; exit points including secondary coverage of call points,</li> <li>* Foyer / Lobby areas,</li> <li>* Post boxes and Postal rooms,</li> <li>* Cycle stores,</li> <li>* Refuse stores,</li> <li>* Underground or covered parking areas,</li> <li>* Top of stair cores</li> </ul> <p>Due consideration to be given to other areas suitable for CCTV throughout the development as part of a site specific risk assessment.</p> <p>Homes 2019 (55.3.7) requests the system conforms to BS EN 62676: 2014 - video surveillance systems - and where applicable BS7958: 2015 CCTV management and operation codes of practice (COP) as outlined by the requirements of the Information Commissioner's Office.</p>
<b>Quality</b>	Should be of good facial recognition and colour HD quality in both daylight and night vision.
<b>Housing &amp; Signage</b>	CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development.
<b>Storage &amp; Access</b>	<ul style="list-style-type: none"> <li>• Footage should be preserved for a minimum of 31 days.</li> <li>• Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office.</li> <li>• To be stored securely on a remote cloud system, or on a locked and secured hard drive i.e. within a secure area behind a PAS24:2016 door or SR1 lockable steel cabinet.</li> <li>• Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes.</li> </ul>

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Party Walling	
<b>Communal to Apartment Walling Preferred System</b>	Light weight framed walls either side of a secure door set (including 600mm around the whole door set) and partitioned walls between two dwellings or communal space shall meet the requirements below: <ul style="list-style-type: none"> <li>• LPS1175 (Issue 7.2) SR1</li> <li>• LPS1175 (Issue 8) SR1/A1</li> <li>• STS202 Issue 7 BR1</li> </ul>
<b>Apartment to Apartment Party Walling Alternative</b>	All avenues must be explored to meet the standards above, however the following are potential alternatives if the above cannot be achieved. To be agreed by DOCO. <ul style="list-style-type: none"> <li>• E-WT-2 Timber Wall</li> <li>• E-WS-3 Light Steel Wall</li> <li>• E-WM-20 Masonry Wall</li> </ul> Installation of 9mm (min) timber sheathing or expanding metal in the areas concerned. Wherever possible C-Studs should have 300mm staggered centres.

Public Realm & Landscaping	
<b>Permeability</b>	<ul style="list-style-type: none"> <li>• Routes for pedestrians, cyclists and vehicles must be open, direct and not unnecessarily separated from one another.</li> <li>• Footpaths should not run to the rear of, and or provide access to gardens, rear yards or dwellings. If this is the case further mitigation will need to be discussed with the DOCO.</li> </ul>
<b>Communal Areas</b>	Communal areas such as playgrounds, podiums seating or amenity areas should be designed to allow natural surveillance from nearby dwellings with safe routes for users to come and go.
<b>Playground Areas</b>	<p>Due consideration to be given to child safeguarding including preventing dogs entering, abductions and children walking out unnoticed by guardian/s. Playgrounds should be:</p> <ul style="list-style-type: none"> <li>• Located to allow natural surveillance from nearby dwellings.</li> <li>• Clear signage stating age restrictions for specific areas and equipment (i.e. under 5's).</li> <li>• Ideally be fully enclosed with 1.2m open top railings or planting, to prevent casual users.</li> <li>• Should be a single dedicated entrance/exit point to enable parent/guardian supervision</li> <li>• Dedicated entrance/exit point to be gated with self-closer.</li> <li>• Ideally designed to be secured at night, if so boundary heights to be raised.</li> <li>• Vandal resistant equipment to be installed.</li> <li>• Historically playgrounds located at the rear of dwellings create ASB flashpoints and where possible should be avoided.</li> <li>• Lighting needs to be a consideration. 24/7 lighting implies a suggestion of use out of hours (Site specific)</li> </ul>
<b>Landscaping Scheme</b>	A full landscaping scheme plan should be submitted and discussed with the DOCO.
<b>Sight lines</b>	<ul style="list-style-type: none"> <li>• Bushes and shrubs maximum 1m high.</li> <li>• Trees should a canopy height of 2m minimum and maintained to allow clear sight lines.</li> <li>• Landscaping and trees, should be designed to complement CCTV or lighting plans with long term maturity a consideration.</li> </ul>
<b>Defensive Planting</b>	<p>Used to create distance from vulnerable areas such as patios, balconies and windows. The usage of defensive planting can complement perimeter boundaries. Defensive planting recommendations:</p> <ul style="list-style-type: none"> <li>• Plants with flowers for aesthetics and to deflect harsh appearance.</li> <li>• To be mature planting from installation and reach a maximum height of 1m where sight lines need to maintained. Depth of planting will be site specific recommendations.</li> <li>• Positioned beneath windows and next to fences to deter potential offenders.</li> <li>• Require regular maintenance to prevent getting overgrown.</li> <li>• May require signage to warn of risk of injury (Occupiers Liability Act).</li> </ul>

**Additional note** – This scheme incorporates one floor for cycle storage, discussions must be made with DOCO to determine the best access strategy to ensure that the area is not abused

**Appendix 2: Planning Policy****London Plan 2021****Policy D11: Safety, Security and Resilience to Emergency**

This policy links design out crime, counter terrorism prevention measures and acknowledges fire safety issues.

**Section B** of policy D11

Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.

**Section C** of policy D11

These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. The policy considers not just crime, but also a wide range of hazards, such as fire, flood, extreme weather and terrorism. New buildings should therefore be **resilient** to all of these threats.

**Paragraph 3.11.3**

Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.... This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

**Paragraph 3.11.4**

The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

**Paragraph 3.12.10**

**Fire safety and security measures** should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.

**DMM4 (Policy DM2) Part A(d)** "Have regard to the principles set out in 'Secured by Design'"

**DMM5: Para 2.14** - "Proposals will be assessed against the principles of secured by design". The latest published guidance in this respect should be referred."

**An Independent Sustainability report by AECOM on Tottenham area action plan states:** "Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale".

**12.3 of same report states:**

- Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.

This report gives recommendations. Please note that Crime Prevention Advice and the information in this report does not constitute legal or other professional advice; it is given free and without the intention of creating a contract or without the intention of accepting any legal responsibility. It is based on the information supplied and current crime trends in the area. All other applicable health, safety and fire regulations should be adhered to.

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- There are no references to crime in the **overarching policies**, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.
- There are no references to crime in the **neighbourhood area sections**; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest.

**Appendix 3 : Crime Figures**

The crime figures provided below are publicly available on the Internet at <http://www.met.police.uk/>. The figures can at best be considered as indicative as they do not include the wide variety of calls for police assistance which do not result in a crime report. Many of these calls involve incidents of anti-social behaviour and disorder both of which have a negative impact on quality of life issues.

Haringey is one of 32 London Boroughs policed by the Metropolitan Police Service. It currently has crime figures above average for the London Boroughs and suffers from high levels of crime and disorder to its residents and business communities.

The following figures relate to recorded crime data from Police.uk for the below area:



Whilst we cannot provide information down to street area the above information does indicate the level of ASB and associated crime that is typical for the ward, which should be a consideration when designing a development to ensure the reduction in fear of crime as well as crime itself.

**Anti-Social Behaviour (ASB)**

Particular attention must be drawn to the most prevalent type of incident that will be experienced – **Anti-Social Behaviour (ASB)**. This category covers a multitude of types of incident that can range from what appears quite trivial annoyance to serious criminal acts. Often victims are able to shrug off the minor incidents and do not have the time or energy to report every occurrence, however en masse these create a significant problem.

Research by Ward, Thompson and Tseloni (2017) which was quoted in the victim commissioners report on ASB in 2019 stated:

*Less than a third of ASB incidents were reported to the three main reporting agencies - According to the 2015/16 CSEW, approximately 31% of ASB incidents were reported to the police, local authority or housing association/private landlord. Of those reported, most were reported to the police (of all agencies).*

It is therefore reasonable to assume that the statistics regarding ASB misrepresents the true scale of the problem – the actual figure of incidents is likely to be well over **32 incidents** of ASB per month.


Health and Safety Executive (HSE)

Comments noted.  
Conditions included

## Advice to the local planning authority

Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building.

To LPA	London Borough of Haringey
LPA planning ref no	HGY/2025/3217
Our ref	25-1040
Site address	Mallard Place, 1 Mallard Place, Wood Green, London, N22 6TS
Proposal description	Full Planning Application for the demolition of existing buildings to deliver a new development comprising affordable housing (Use Class C3) and flexible workspace (Use Class E) alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.
Date on fire statement	06/11/2025
Date consultation received	28/11/2025
Date response sent	19/12/2025

### 1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ("content")

#### Scope of consultation

1.1. The above planning application relates to a new mixed-use development, located in London Borough of Haringey. The building includes two tower blocks (East Tower block and West Tower block) connected at the ground and first floor levels, and by a podium at level 2.

1.2. The development consists of two sections: residential (150 residential dwellings including 100% socially rented homes) and commercial (660 sqm of flexible Use Class E floorspace). A commercial unit will be provided at the ground level in the West Tower block

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and workspaces will be located in the connecting block and East Tower block at the ground and first floor levels.



- 1.3. Section 6 (b) of the Fire Statement confirms that the heights of the building will be:
- East Tower block: 68.1m (22 storeys: ground floor GF, plus levels L1 to L21);
  - West Tower block: 42.2m (14 storeys: ground floor GF, plus levels L1 to L13); and
  - connecting block: 7.5m (3 storeys: ground floor GF, plus levels L1 and L2).



1.4. Each tower block will be served on all storeys by two stairs: an evacuation stair and a firefighting stair. The firefighting stair will be part of a firefighting shaft which also contain: a firefighting lift, a smoke ventilated firefighting lobby, and a fire main outlet located at the full landing of the stair. The West Tower block will be provided with dry rising main, while the East Tower block will be provided with wet rising main. The workspaces will be provided with two escape stairs and an evacuation lift.

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### Consultation

1.5. Section 6 (building schedule) of the fire statement confirms that the design standards used are BS9991:2024 ('Fire safety in the design, management and use of residential buildings – Code of practice') for the residential areas, and BS9999:2017 ('Fire safety in the design, management and use of buildings – Code of practice') for the non-residential areas. HSE has assessed the application accordingly.

1.6. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified matters that the applicant should try to address in advance of later regulatory stages.

## 2. Supplementary information

*The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.*

### Children's play spaces

2.1. The proposed floor plan drawings show that the podium at level 2 and the external terraces at level 6 and level 8, will include a children's play space. The *Play Space Provision* section within *Design and Access Statement and Landscape Report (7.3 Podium Strategy and Roof Terrace Design)* dated November 2025, states: "*Therefore the strategy for play space provision responds to the contextual analysis, with age groups 0-4 and 16-17 prioritised. 197sqm for 0-4 year-olds is provided on level 02 podium, benefiting from the surveillance & enclosure provided by the adjacent dwellings. 80sqm for 5-11 year-olds is provided on levels 06 & 08 podiums, benefiting from the security of on-site play space. 33sqm for 16-17 year-olds is provided in the form of 'hang-out' space across all podium levels, comprising of social seating areas.*"

2.2. It is not clear from the information provided whether such play spaces will cater for children separated from parents/guardians. Where a building caters for children in separate areas from their parents/guardians, the parents/guardians will, in a fire incident, instinctively move towards their children. This may result in clashing streams of people and/or firefighters which may inhibit means of escape and/or firefighting operations.

2.3. Play facilities for children that are unsupervised and separated from their parents or guardians should be sited adjacent to escape routes used by parents or guardians exiting the building. This is to avoid conflicting flows as parents or guardians collect their children before escaping. At later regulatory stages, it will be for the applicant to demonstrate that the play spaces are managed effectively so that the means of escape is capable of being effectively used at all material times.

### Smoke Ventilation and Computational Fluid Dynamic (CFD) modelling

2.4. It is understood that all lift lobbies will be provided with natural smoke ventilation, and a mechanical smoke ventilation system is proposed for all common corridors.

2.5. Section 8 of the *Fire Statement*, states: "*The mechanical smoke ventilation systems will have a deterministic **Computational Fluid Dynamics (CFD)** assessment performed to demonstrate the system meets the required performance for the residential common corridors.*"

2.6. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations.

**Green Roof**

2.7. The Proposed Roof Plan drawings show the proposed installation of a green roof. A green roof may constitute a fire hazard as it requires a regular management and maintenance regime, and the external envelope of a building should not provide a medium for undue fire spread. Where a green roof is proposed, sufficient fire resistance to prevent fire spread to any adjoining roofs/wall(s) will be required. It will be for the applicant to demonstrate that the proposed green roof is viable in relation to fire safety at later regulatory stages.

2.8. Guidance for green roofs can be found in [Fire performance of green roofs and walls - GOV.UK \(www.gov.uk\)](#), published by the Department for Communities and Local Government. Where regulation 7(2) applies, that regulation prevails over all the provisions in this paragraph.

**Photovoltaic (PV) panels**

2.9. The proposed roof plan drawings show that the proposal includes provision of photovoltaic panels. Where the roof top installation of PV panels is proposed, it should be noted that fire safety standards require suitable support of cabling to avoid obstruction of escape routes and firefighting access due to the failure of fixings and consideration should be given to ensure that all power supplies, electrical wiring, and control equipment is provided with appropriate levels of protection against fire.

Yours sincerely

*S. Bucur*

Sorin Bucur  
Fire Safety Information Assessor

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Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

This response does not provide advice on any of the following:

- matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application
- matters related to planning applications around major hazard sites, licensed explosive sites, and pipelines
- applications for hazardous substances consent
- London Plan policy compliance

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Transport for London



[planning@haringey.gov.uk](mailto:planning@haringey.gov.uk)  
Planning Placemaking and Housing  
Haringey Council  
Alexandra House (5th Floor)  
10 Station Road,  
London  
N22 7TR

Transport for London  
Crossrail 2  
Safeguarding Manager  
Palestra House  
197 Blackfriars Rd  
London  
SE1 8NJ

04 December 2025  
Crossrail 2 Ref: CR2-5516-2025

Dear Valerie Okeyi,

**HGY/2025/3217 : Mallard Place, Coburg Road, Wood Green, London, N22 6TS**

*Full Planning Application for the demolition of existing buildings to deliver a new development comprising affordable housing (Use Class C3) and flexible workspace (Use Class E) alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.*

Transport for London administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.

Thank you for your letter dated 28 November 2025, requesting the views of the Crossrail 2 Project Team on the above application. I confirm that the application relates to land within the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction. If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, please apply the following conditions on the Notice of Permission:

C1 None of the development hereby permitted shall be commenced until detailed design and construction method statements for all the ground floor structures, foundations and basements and for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Local Planning Authority which:

- (i) Accommodate the proposed location of the Crossrail 2 structures including tunnels, shafts and temporary works,
- (ii) Accommodate ground movement arising from the construction thereof,
- (iii) Mitigate the effects of noise and vibration arising from the operation of the Crossrail 2 railway within the tunnels and other structures,

The development shall be carried out in all respects in accordance with the approved design and method statements. All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i), (ii) and (iii) of this condition shall be completed, in their entirety, before any part of the building[s] [is] [are] occupied.

**Informative:**

Transport for London is prepared to provide to information about the proposed location of the Crossrail 2 tunnels and structures. It will supply guidelines about the design and location of third-party structures in relation to the proposed tunnels, ground movement arising from the construction of the tunnels and noise and vibration arising from the construction and use of the tunnels. Applicants are encouraged to discuss these guidelines with the Crossrail 2 engineer in the course of preparing detailed design and method statements.

The latest project developments can be found on the Crossrail 2 website [www.crossrail2.co.uk](http://www.crossrail2.co.uk)

**MAYOR OF LONDON**



VAT number 756 2770 08

I hope this information is helpful, but if you require any further information or assistance then please feel free to contact a member of the Safeguarding Team by email to:

[crossrail2@tfl.gov.uk](mailto:crossrail2@tfl.gov.uk)

Safeguarding Manager Crossrail 2

Investment Planning : Professional Services

Transport for London

**MAYOR OF LONDON**



VAT number 756 2770 08



Ms Valerie Okeiyi  
London Borough of Haringey  
River Park House  
225 High Road  
Wood Green  
LONDON  
N22 8HQ

Direct Dial: 07795220772

Our ref: P01601646

15 December 2025

Dear Ms Okeiyi

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**MALLARD PLACE, 1 MALLARD PLACE, WOOD GREEN, LONDON, N22 6TS  
Application No. HGY/2025/3217**

Thank you for your letter of 28 November 2025 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](https://www.historicengland.org.uk)

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.



Historic England

Clemency Gibbs  
Inspector of Historic Buildings and Areas  
E-mail: [clemency.gibbs@historicengland.org.uk](mailto:clemency.gibbs@historicengland.org.uk)



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.*

<b>Greater London Archaeological Advisory Service</b>	<p>Thank you for your consultation of 28/11/2025 regarding the above application for Planning Permission. On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England's Greater London Archaeological Advisory Service under their consultation criteria, details of which are on our webpage at the following link:</p> <p><a href="https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice">https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice</a></p> <p>If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request. If we do not hear from you within five working days we will assume this application should not have been sent to us.</p> <p>This response relates to undesignated archaeological assets only. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.</p>	
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Valerie Okeiyi  
Development Management  
London Borough of Haringey



**London Healthy Urban  
Development Unit**

By email only:

20 Churchill Place  
London  
E14 5HJ

nelondonicb.hudu@nhs.net

14/01/2026

Dear Valerie,

**Application Ref:** HGY/2025/3217  
**Address:** Mallard Place, 1 Mallard Place, Wood Green, London, N22 6TS  
**Proposals:** Full Planning Application for the demolition of existing buildings to deliver a new development comprising 150 new council homes (Use Class C3) and flexible workspace (Use Class E), erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing; alongside public realm improvements, soft and hard landscaping, cycle parking, blue badge parking, servicing and delivery details and refuse and recycling provision.

Thank you for consulting the NHS Healthy Urban Development Unit (HUDU) on the above application. HUDU act on behalf of NHS North Central London Integrated Care Board (NCL ICB), which commissions and oversees healthcare services for residents of Haringey.

**1. Existing primary care position**

Primary care services in the borough are under significant pressure due to limited clinical space and difficulties in recruiting additional GPs and clinical staff, which limits practices' ability to expand capacity and enhance services for local residents.

The three GP practices operating closest to the development site (Hornsey Park Surgery, Staunton Group Practice and High Road Surgery) are operating significantly above the Department of Health's recommended GP to Patient Ratio of 1:1800. The new patient population associated with the proposed development would add further pressures.

**2. HUDU Model**

Paragraph 11.3.37 of the London Plan requires boroughs to use the HUDU Model to calculate the capital costs of additional health facilities needed to meet increased demand, and to secure developer contributions for this purpose.

Accordingly, the HUDU model has been used to assess the impact of this development on local health infrastructure. This assessment uses development-specific modelling, taking into account the proposed number of units and tenure, alongside borough-specific healthcare and demographic data (including Hospital Episode Statistics and Census data).

NHS HUDU has also worked with NCL ICB to determine the appropriate mitigation measures and the level of contribution required. Consequently, both the modelling and requested planning contribution are tailored to this development, rather than being generic.

Based on the HUDU Model findings, the NHS is requesting a section 106 financial contribution of **£83,600** to expand primary care capacity within the vicinity of the site and accommodate the population growth created by this proposal.

### 3. CIL Regulation 122

The requested contribution would meet the tests as set out in the CIL Regulation 122 for the following reasons:

- **Necessary to make the development acceptable in planning terms:**

The NHS has evidenced the constrained capacity in local healthcare infrastructure that serves the development, and without mitigation the development would negatively impact existing infrastructure and new and existing residents.

- **Directly related to the development:**

The NHS has used the HUDU model to calculate the anticipated patient population growth and consequential clinical infrastructure demand, based specifically on the development specification as detailed in the application particulars.

- **Fairly and reasonably related in scale and kind to the development:**

The HUDU Model has determined that the total capital cost required to support the healthcare impact (across acute, mental health, intermediate and primary care) of this development is £403,337. However, the NHS is seeking a Section 106 contribution of **£83,000**. This figure is the result of engagement with NCL ICB to ensure that the mitigation proposed is both targeted and proportionate. The requested contribution is directly informed by the specific capacity constraints and needs of the local healthcare system and is essential to safeguarding service provision for both new and existing residents.

#### Conclusion

The existing primary care facilities within the vicinity of the development sites do not have capacity to support the increase in population resulting from the proposed development. The new development will place additional strain on already stretched local healthcare services. To address this, it is necessary to secure financial contributions to mitigate the impacts of the proposed development.

Should you need any additional information or clarification in relation to the above, please do not hesitate to get in touch.

Yours sincerely,

M. Summers

	<p><b>Mhairi Summers</b> Planning Officer NHS London Healthy Urban Development Unit.</p>	
<b>NEIGHBOURING PROPERTIES</b>		

## APPENDIX 4 Greater London Authority Stage 1 Response

GREATERLONDONAUTHORITY

Planning report GLA/2025/1008/S1/01

12 January 2026

**1 Mallard Place, Chocolate Factory – Phase 2**

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2025/3217

**Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**The proposal**

Full planning application for the demolition of existing buildings on the site to deliver 150 affordable social-rented dwellings (Use Class C3) within buildings up to a maximum of 22 storeys, with 539sqm flexible workspace (Use Class E) on the ground and first floors.

**The applicant**

The applicant is **Haringey Council**, and the architect is **Levitt Bernstein**.

**Strategic issues summary**

**Land use principles:** The redevelopment of the site to provide affordable housing and flexible workspace within a town centre and an Opportunity Area is strongly supported in strategic planning terms. The provision of affordable workspace is welcomed. It must however be demonstrated that the application will secure replacement premises for the existing SEN education use, or else robust evidence submitted that this use is not required in the borough.

**Affordable housing:** The proposal is to deliver 150 affordable housing units (100% by habitable room) consisting of 100% social-rented homes. This is strongly supported, and the scheme can follow the Fast Track Route.

**Urban design and heritage:** Whilst the site is not identified as suitable for tall buildings the proposal is coming forward in the context of an emerging tall building cluster, and the heights are acceptable in this context. A low level of harm may be caused to the significance of Alexandra Park (Registered Park and Garden) which could be outweighed by the public benefits of the proposal.

**Transport:** Further information is required on ATZ and trip generation, and mitigation to local connectivity to align with ongoing initiatives. and a parking design and management, travel, delivery and servicing, and construction logistics, plans should be secured by conditions.

**Environment and sustainable infrastructure:** Further information is required, and matters raised should be addressed prior to the Mayor's decision-making stage.

**Recommendation**

That Haringey Council be advised that the application does not fully comply with the London Plan for the reasons set out in this report. Outstanding matters related to design and heritage, transport, environment and sustainable infrastructure should be addressed.

**Context**

1. On 2 December 2025, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Categories of the Schedule to the Order 2008:
  - **Category 1A** "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."
  - **Category 1B:** "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres."
  - **Category 1C:** "Development which comprises or includes the erection of a building of one or more of the following descriptions- (c) the building is more than 30 metres high and is outside the City of London."
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk/>

**Site description**

5. The 0.44ha site is located approximately 500m southwest of Wood Green Town Centre within the Wood Green Opportunity Area (OA). This OA covers about 50ha and has the potential to create 2,000 new jobs and about 1,000 additional homes.
6. Currently, the site contains a two-storey building which was used for education purposes and adjoins John Raphael House (religious institution) to the south-west and two storey industrial units to the north-east.
7. The site is immediately bordered to the south by Coburg Road. Just beyond Coburg Road is light industrial development and the Honeycomb Nursery (0.064km). Just south of Coburg Road, construction work is currently underway to deliver the Clarendon Gas Works development – known as Haringey Heartlands (LPA Ref: HGY/2017/3117 - approved in April 2018), a mixed-use

development for up to 163,300sqm of residential floorspace and 7,500sqm of business space, along with retail, a day nursery, shops, leisure space, energy centres, open space and associated amenities.

8. Western Road bounds the site to the west with the railway line and Alexandra Park and Palace beyond. Adjoining the site to the north is a new road which provides access to the Chocolate Factory Phase 1 which is part of the wider masterplan, with a number of new buildings up to heights of 18 storeys.
9. The site forms part of local Site Allocation 19: Wood Green Cultural Quarter (South) which allocates the site for 355 new homes and 12,243sqm of commercial floor space. The site has a public access transport accessibility level (PTAL) rating of 4 (on a scale of 0-6b where 6b is the highest). The site sits above the potential Wood Green Crossrail 2 route.

#### **Details of this proposal**

10. The detailed planning application seeks permission to redevelop the site to deliver 150 affordable social-rented dwellings within buildings up to a maximum of 22 storeys, with 539sqm flexible workspace on the ground and first floors.
11. The proposed buildings will range in height from 2-22 storeys. The east tower is proposed as a 22-storey building with an 8-storey wing. The west tower is proposed as a 14-storey building with a 6-storey wing. The buildings will be set around a two-storey podium.

#### **Case history**

12. Pre-application meetings were held between the GLA and the applicant in 2025 to redevelop the site for a similar proposal to the current submitted scheme and written advice was issued by the GLA.
13. A planning permission for a 13-storey tower comprising of 57 affordable homes was approved in 2019 within the site's red line boundary. This was not constructed.

#### **Strategic planning issues and relevant policies and guidance**

14. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Local Plan Strategic Policies 2013-2026, Development Management DPD 2017, Site Allocations DPD 2017; and the London Plan 2021.
15. The following are also relevant material considerations:
  - The National Planning Policy Framework and National Planning Practice Guidance.
  - Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on Design, Housing, Heritage and Culture, Green Infrastructure and Natural Environment, Sustainable Infrastructure and Transport which can be found on the GLA's website [here](#).<sup>1</sup>

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<sup>1</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan><https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

- Draft LPG 'Support for Housebuilding' [Support for Housebuilding LPG | London City Hall](#)
- A Written Ministerial Statement regarding a package of targeted and temporary emergency support measures to drive up housebuilding in London was issued on the 23 October 2025 by the Secretary of State for Housing, Communities and Local Government. This was accompanied by a joint Policy Statement with the Mayor of London "Homes for London a package of support for Housebuilding in the Capital."
- Draft National Planning Policy Framework issued on 16 December 2025: <https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

## **Land use principles**

### Housing use

16 The proposed development would provide 150 residential units (Use Class C3), which would contribute to London and local housing targets, and is therefore supported in line with Policy H1 of the London Plan. The proposal will contribute 5.2% to the Borough's overall yearly housing target of 2,878 dpa and maximises the delivery of affordable housing within the Wood Green Opportunity Area, providing 100% affordable housing whilst also contributing to the regeneration within the Wood Green Cultural Quarter (SA19) in line with London Plan Policy SD1.

### Workspace use

17 The flexible workspace on the ground and first floors will create employment opportunities within the OA, also in line with London Plan Policy SD1. The provision of affordable workspace is welcomed and should be secured by condition.

### Loss of education use

18 The site contains an existing SEN educational use which is not proposed to be replaced by the proposed development. Policy S1 of the London Plan states that "Development proposals that would result in a loss of social infrastructure in an area of defined need...should only be permitted where: 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or; 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services." In this instance, it is understood that the loss of educational use on site has been agreed by the Council and an alternative suitable site is being explored. As it is not clear that the closure of this SEN educational use is part of a wider transformation plan, or that its closure would not negatively impact on SEN provision in the borough, GLA officers consider that the alternative premises should be secured as part of any planning permission on this site, or else a strong rationale provided as to why the service is not needed in the borough. This was requested at the pre-application stage but has not been provided as part of this application. It must be provided prior to Stage 2 consideration.

## Conclusion on land use principles

19 Overall, GLA officers strongly support the provision of 100% affordable housing units and flexible workspace on the site in accordance with London Plan Policies H1, H4, and SD1. Any planning permission must secure alternative premises for the SEN educational use, however, and/or provide strong rationale for why this service is not needed in the borough.

## **Equalities**

20 The Public Sector Equality Duty, set out at Section 149 of the Equality Act 2010, requires public bodies, when exercising their functions, to have 'due regard' to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

21 Given the proposed loss of the existing educational use (Area 51 Education) and proximity to John Raphael House (a place of worship) the applicant provided an Equality Impact Assessment (EqIA).

22 The EqIA highlights the following potential impacts on people with protected characteristics:

- The closure of Mallard Place (currently home to Area 51 Education/John Dewey Specialist College which provide private SEND services) could negatively impact on young and disabled people.

23 Additionally, whilst the EqIA has not identified this impact, GLA officers note that construction work in proximity to a place of worship could negatively impact on people with religious beliefs.

24 These impacts could be mitigated in the following ways:

- Alternative premises for the SEN use should be found in the borough. The Council is working with Area 51 Education to find suitable alternative premises by July 2026.
- A construction management plan, outlining engagement with the adjacent place of worship, should be secured.
- The mitigation measures to be recommended must be secured as part of any planning permission, including measures to secure alternative education premises in advance of their closure to avoid negative impacts on specialist education provision and disabled people in the borough. As per the above paragraphs, these measures must be outlined to the GLA prior to any Stage 2 referral.

## **Affordable housing**

25 The proposal will deliver 150 affordable housing units consisting of 100% social-rented homes, of which 98 units (over 65%) are family-sized homes. This is strongly supported, and the application is compliant with the Fast Track Route.

No viability reviews are necessary given the 100% social rented tenure proposed.

## **Urban design**

### Development layout

- 26 The layout is largely informed by the spatial constraints of the site, including the safeguarding zone for Crossrail 2 and the need to design around the two corner sites lying outside of the red line boundary.
- 27 The northern portion of the site (Block D) formed part of the wider 2019 approved scheme which included a part 13, part 4 storey building with commercial street frontage. The proposal utilises the footprint and massing principles of the consented building and mirrors it to form a perimeter block. This approach is supported and responds successfully to the established movement principles of the surrounding area.
- 28 While a more comprehensive approach to the whole urban block is encouraged in the interests of achieving best placemaking principles and optimising the full development potential of the site, the proposed layout allows for the future development of the two corner sites to form a consolidated urban block which is welcomed. The development considers maximising opportunities for sunlight penetration into the courtyard space, as well as views outwards for residents, with breaks in the massing and building lines, which is supported. The combination of the proposed podium and the efficiency of the block layouts ensures that active ground floor public facing frontages are maximised which also includes an appropriate mix of residential (interfacing with Phase 1 to the north) and commercial (interfacing with future Clarendon Gasworks to the south). The design team have optimised sunlight penetration into the courtyard space, as well as views outwards for residents, with breaks in the massing and building lines. This is welcomed.

### Scale and massing

- 29 The heights and massing configuration is well thought out with a successful positioning of two tall buildings on the site. The 22-storey building responds to the primacy of key pedestrian routes along Clarendon Road/Coburg Road, as well as responding successfully to an emerging cluster of tall buildings within the future phases 4 and 5 to the south. The other proposed 14-storey building is consistent in scale with the consented Phase 1 Block D and helps to mediate in scale between the 20+ storey buildings to the south and low to mid rise development to the north. It is noted that the location of taller buildings is largely dictated by the Crossrail 2 safeguarding zone.
- 30 Whilst Haringey's Site Allocation DPD does not identify the site as suitable for a tall building, and so the tall buildings do not meet the locational requirements of London Plan Policy D9, Part B, the proposed heights and massing configuration is supported given the context outlined above. In terms of the impacts of the tall buildings, the visual and cumulative impacts are acceptable for the reasons outlined above. The proposals would have very limited impact on heritage assets which could be outweighed by the public benefits of the proposal which provides 100% affordable housing. There are no strategic concerns at this stage relating to the functional and environmental impacts of the tall buildings. The detailed

environmental information regarding daylight, sunlight and wind microclimate will be reviewed by the Council and any suitable mitigation measures should be secured.

## Residential quality

- 31 The efficient building forms and use of deck access to each of the lower rise blocks creates a very high proportion of dual aspect units which is strongly supported.
- 32 The double height podium ensures the shared courtyard space is more elevated and likely to receive more sunlight penetration and improved outlook as a result. However, it does appear spatially constrained relative to the density proposed and will need to be designed accordingly to ensure it is usable, meeting the amenity requirements of residents, including 0–5-year-old children's playspace.
- 33 It is noted that roof space of the lower rise blocks has potential to provide additional amenity, including play space which is welcomed.

## Architectural quality

- 34 The simple and refined approach to the building forms is welcomed and appropriately draws on the industrial heritage of the area. The efficient footprints of the taller buildings and chamfered corners would create elegant building forms at both close and longer range. The use of concrete framing with brick recesses is supported and allows the opportunity to express key areas including the base of the buildings while introducing visual interest through detailing and contrasting brick tones. The applicant is encouraged to continue to work closely with the Council to secure high design quality through attention to detail and materials selection.

## Fire safety

- 35 In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features including installation of sprinklers and means of access for fire service personnel.
- 36 Further to the above, the proposal meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. The floor plans indicate that all units in the buildings above 18 metres have access to at least two staircases. As a result, the fire safety statement complies with Policies D12, and D5 of the London Plan and all proposed measures should be secured by appropriate conditions.

## Inclusive access

- 37 The application documents confirm that 10% of the dwellings would be designed to be accessible or adaptable for wheelchair users in accordance with Policy D7 of the London Plan. Two accessible lifts per core would be provided. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

## Heritage

38. The site is in the setting of the following designated heritage assets (excluding conservation areas):

- Alexandra Palace, listed Grade II and Alexandra Park, a Grade II Registered Park and Garden (to the west and looking down on the site);
- Top Rank Club, (former Gaumont Cinema) listed Grade II\*;
- Tunnel entrance to the New River, listed Grade II.

39. The proposed development consists of elements of 1, 2, 6, 8, 14 and 22-storeys in height. A Heritage assessment has been provided including a ZTV diagram, although the ZTV has not been overlaid with the heritage assets and views of the proposal in relation to the above-mentioned built heritage assets have not been provided. Officers consider it unlikely that the proposal would affect the significance derived from the setting of the three listed buildings described above, due to the limited intervisibility between the sites (or, in the case of Alexandra Palace, the fact that the building would not affect key views of the principal elevations), but this should be confirmed.

40. In relation to Alexandra Park, the proposed tall building would form a new tall element that would be visible from the park and would breach the skyline in views from Alexandra Palace viewing platform. This may cause a very low level of less than substantial harm to the significance of the Registered Park and Garden, which could be outweighed by the public benefits including the provision of 100% social-rented housing.

41. It is confirmed that the view from Alexandra Palace viewing terrace is included within the LVMF (Viewing Location 1A), but the site lies outside the south-facing view cone, and therefore, not affected by the proposed development.

## Transport

### Active Travel

42. The proposal supports active and sustainable travel, reducing car dominance which is welcomed in line with Healthy Streets indicators. The submitted Active Travel Zone (ATZ) assessment is broadly accepted and has considered suitable routes, modes with a day and nighttime assessment. The submission ATZ outlines items of local mitigation which the Council should secure to support the strategic mode shift, and to support ongoing local connectivity initiatives including Coburg Road and a cycleway from Wood Green station to Highgate via Western Road and the Penstock Tunnel to enhance active travel in the vicinity of the site.

### Cycle Parking

43. The proposed quantum and design of cycle parking for both residential and non-residential elements align with London Plan Policy T5 and should be secured by the Council, including in line with London Cycle Design Guidance (LCDS).

### Car parking

44. The development is proposed to be car-free, in line with Policy T6, with 12 disabled persons parking spaces from the outset, with the potential to provide more if required.

Deliveries, servicing and construction

45. The Delivery and Servicing Plan and Construction Logistics Plan should be secured by the Council, in line with London Plan Policies T4 and T7. The site is within Crossrail 2 safeguarding limits and has been designed to take the route into account and conditions will need to be secured.

Transport Network Impacts

46. The submitted Transport Assessment outlines the forecast travel demand, including an assessment of trip generation and mode share split. The assessment is broadly accepted and mitigation towards active travel routes should be secured by the Council.

47. A Framework Travel Plan has been provided which is broadly accepted. This should be secured by the Council.

**Environment and sustainable infrastructure**

**Energy strategy**

48 The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

Energy strategy compliance

49 An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies (SI2, SI3 and SI4). The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

- Be Lean – modelling and reporting refinements.
- Be Clean – demonstration that the number of energy centres has been minimised, and further detail on reasoning for not connecting to existing energy centre
- Be Green – demonstration that renewable energy has been maximised, including updated roof layouts showing the extent of PV provision and details of the proposed air source heat pumps.
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement.
- Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation.
- Managing heat risk – further details to demonstrate the cooling demand is below notional in non-domestic space.

Carbon savings

50 For the domestic element, the development is estimated to achieve a 67% reduction in CO2 emissions compared to 2021 Building Regulations. For the non-domestic element, a 19% reduction is expected. The development falls short of

the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the Council's carbon offset price. The draft s106 agreement should be submitted to evidence the agreement with the Council.

#### **Whole Life-cycle Carbon**

51 The applicant has submitted a whole life-cycle carbon assessment, in line with the London Plan Policy SI2, but does not fully comply with the policy. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions, suggested condition wording is available on the GLA website<sup>2</sup>. Full technical details have been provided to the Council and applicant in an excel memo that should be responded to prior to any Stage 2 referral.

#### **Circular Economy**

52 The applicant has submitted a Circular Economy Statement. Currently, the information provided does not demonstrate the proposals meet London Plan Policy SI7, or the Circular Economy principles set out in London Plan Policy D3. There are some areas where additional information is required to confirm how the proposal will achieve GLA targets. Some additional detail is requested with respect to the response to CE principles and the proposed end-of-life strategy. A condition should be secured requiring the applicant to submit a post-construction report, suggested condition wording are available on the GLA website<sup>3</sup>. Full technical details have been provided to the Council and applicant in an excel memo that should be responded to prior to any Stage 2 referral.

#### **Urban greening and biodiversity**

53 The development presents a well-considered approach to integrating green infrastructure and urban greening. This includes the incorporation of green roofs, permeable surfaces, and street-level planting, in accordance with London Plan Policy G1. The opportunity for the provision of biosolar roofing should be explored

54 The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.24, which is below the target set by Policy G5 of the London Plan. Whilst there are many positive design features embedded in the scheme, the applicant should review the urban greening proposed, seeking to improve the quality or quantity, to increase the application's UGF. Features for consideration may include improving the quality of the proposed green roof, introduce planting at the ground level and expand greening on the proposed

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

<sup>3</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

terraces. If the target score cannot be achieved, the applicant should set out robust justification.

55 The applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 14.14% (0.42 HU) in accordance with Policy G6 of the London Plan. The trading rules regarding individual trees have not been satisfied, therefore an additional 0.19HU is required to meet trading rules. On-site biodiversity enhancements are preferable, so the applicant should seek to increase the biodiversity net gains on-site where possible, whilst following the mitigation hierarchy.

56 Full technical details have been provided to the Council and the applicant in an excel memo that should be responded to prior to any Stage 2 referral.

#### **Sustainable drainage and flood risk**

57 The proposed development is in Flood Zone 1, not within a Critical Drainage Area (CDA) or greater than 1ha in site area. Officers are therefore content that the application can be assessed by the LPA without GLA consultation, and a strategic review has not been undertaken for this case. The LPA is advised to be engaged with the relevant stakeholders to ensure that any issues relating to pluvial (surface water), groundwater, tidal, fluvial (main river and ordinary watercourses) and reservoir flood risks are resolved. The LPA should include a planning condition to meet the 105 l/person/day water efficiency requirement of Policy S15 of the London Plan.

#### **Air quality**

58 An Air Quality Assessment (AQA) has been provided with the application. The report is not considered of sufficient technical quality. The assessment includes a detailed modelling assessment of the operational emissions and an air quality neutral assessment; however, no discussion of the construction phase has been included. A Dust Risk Assessment was not undertaken. No reason has been provided for the scoping out of the construction phase of the development from the assessment. Discussion of NRMM has not been included in the assessment, including compliance with the NRMM Low Emission Zone. Full technical details including recommended conditions have been provided to the Council and the applicant in an excel memo that should be resolved prior to any Stage 2 referral.

#### **Local planning authority's position**

59 Haringey Council planning officers are currently assessing the application. In due course, the Council will formally consider the application at a planning committee meeting.

#### **Legal considerations**

60 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order

to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

**Financial considerations**

61 There are no financial considerations at this stage.

**Conclusion**

62 London Plan policies on land use principles, affordable housing, urban design and heritage, transport, environment and sustainable infrastructure, are relevant to this application. The application does not fully comply with these policies, as summarised below:

- **Land use principles:** The redevelopment of the site to provide affordable housing and flexible workspace within a town centre and an Opportunity Area is strongly supported in strategic planning terms. The provision of affordable workspace is welcomed. It must however be demonstrated that the application will secure replacement premises for the existing SEN education use, or else robust evidence submitted that this use is not required in the borough.
- **Affordable housing:** The proposal is to deliver 150 affordable housing units consisting of 100% social-rented homes. This is strongly supported, and the scheme can follow the Fast Track Route.
- **Urban design and heritage:** Whilst the site is not identified as suitable for tall buildings the proposal is coming forward in the context of an emerging tall building cluster and the heights are acceptable in this context. A very low level of harm could be caused to the significance of Alexandra Park (Registered Park and Garden) which could be outweighed by the public benefits of the proposal.
- **Transport:** Further information is required on ATZ and trip generation, and mitigation to local connectivity to align with ongoing initiatives. Parking design and management, travel, delivery and servicing, and construction logistics, plans should be secured by condition.
- **Environment and sustainable infrastructure:** Further information is required, and matters raised should be addressed prior to the Mayor's decision-making stage.

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For further information, contact GLA Planning Unit (Development Management Team):  
**Tefera Tibebe, Strategic Planner (case officer)**  
email: [tefera.tibebe@london.gov.uk](mailto:tefera.tibebe@london.gov.uk)

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

**APPENDIX 5      QRP REPORT**

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**London Borough of Haringey Quality Review Panel**

Report of Full Review Meeting: Mallard Place

Wednesday 16 July 2025

Level 6 Collaboration Space, Alexandra House, 10 Station Road, London N22 7TY

**Panel**

Esther Everett (chair)  
Phil Askew  
Rosie Bard  
Hugo Braddick  
Louise Goodison

**Attendees**

John McRory	London Borough of Haringey
Valerie Okeiyi	London Borough of Haringey
Saloni Parekh	London Borough of Haringey
Catherine Smyth	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Kirsty McMullan	Frame Projects
Bonnie Russell	Frame Projects

**Apologies / report copied to**

Philip Crowther	London Borough of Haringey
Suzanne Kimman	London Borough of Haringey
Rob Krzyszowski	London Borough of Haringey
Ruth Mitchell	London Borough of Haringey
Joshua O'Donnell	London Borough of Haringey
Biplav Pageni	London Borough of Haringey
Gareth Prosser	London Borough of Haringey
Maurice Richards	London Borough of Haringey
Roland Sheldon	London Borough of Haringey
Ashley Sin-Yung	London Borough of Haringey
Tania Skelli	London Borough of Haringey
Kevin Tohill	London Borough of Haringey
Elisabetta Tonazzi	London Borough of Haringey
Alice Tsoi	London Borough of Haringey
Bryce Tudball	London Borough of Haringey

Report of Full Review Meeting  
16 July 2025  
HQR149\_Mallard Place

**CONFIDENTIAL**

**Confidentiality**

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

**1. Project name and site address**

Mallard Place, Wood Green, London N22 6TS

**2. Presenting team**

Bruno Bridge	London Borough of Haringey
George Gemei	London Borough of Haringey
Kevin Tohill	London Borough of Haringey
Jamie Sullivan	Iceni Projects
Hugo Tomassi	Iceni Projects
Rhys Jones	Levitt Bernstein
Jo McCafferty	Levitt Bernstein
Lotta Nyman	Levitt Bernstein
Thomas Lefevre	Etude

**3. Planning authority briefing**

The site is within an opportunity area (identified in the 2021 London Plan), and a growth area (identified in the Haringey Local Plan 2017). It is also within a designated local employment area, regeneration area, and is adjacent to Wood Green Common Conservation Area. The site has a PTAL rating of 3 to 4.

Site Allocation SA19, known as Wood Green Cultural Quarter (South), seeks an employment-led mixed-use scheme to enhance the Chocolate Factory and create a high-quality urban realm. The immediate vicinity contains a host of designated site allocations that will also contribute to the regeneration of this neighbourhood. Many have planning permission for high-density tall buildings, and some are currently being developed. The most notable examples are the Alexandra Gate and Chocolate Factory schemes.

The proposal is for 150 affordable social rent homes in blocks two, six, seven, eight, 14 and 22 storeys tall. 548 square metres of flexible workspace will also be provided, alongside landscaped amenity space.

Officers support the principle of redeveloping this site for affordable housing and workspace. Officers recognise that, due to fragmented ownership and the adjacent owners showing no interest in land assembly or developing their sites, comprehensive redevelopment of the entire site cannot be achieved at present.

Officers asked for the panel's comments on all aspects of the scheme, including the overheating strategy in particular.

Report of Full Review Meeting  
16 July 2025  
HQR149\_Mallard Place



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### 4. Quality Review Panel's views

#### *Summary*

The Haringey Quality Review Panel warmly welcomes the proposal for affordable housing and workspace, which is thoughtful and comprehensive. The panel encourages the project team to maintain this level of ambition as the scheme develops, and suggests some areas for improvement.

The fragmented land ownership means that comprehensive redevelopment cannot happen within the timescale of the application. This is not optimal, but could be turned into an advantage and lead to a more successful scheme. If the southern and northern corner sites come forward for development, they should offer green relief from the density of neighbourhood, including children's play and bike storage. High-level options should be produced to set intentions within this application.

The height and massing are comfortable in the context, but would be improved by moving the 22-storey tower away from the emerging 27-storey tower on the Alexandra Gate site. The existing mature trees on the site should be retained, and this corner widened for orientation towards Chocolate Factory Square. Options should be tested, subject to the Crossrail 2 tunnel constraints, for moving the height and rebalancing the blocks to achieve a more favourable massing.

The quality of the housing proposed is commended. Further thought should be given to how the scheme will create a cohesive vertical community. The chamfered tower corners should have a stronger relationship to each other. A consistent base treatment is recommended, and the junctions between blocks should be resolved. The elevations and materials palette are developing well. Sustainability has been successfully embedded in the design, and the use of external shading is supported.

The boulevard of trees along Coburg Road are essential to the public realm. The purpose and design of the colonnade needs further work. The podium garden should not enclosed be on all sides in the future. All landscaping should be designed for low maintenance and water management.

The lower-level workspace provision is welcome. Flexible design and low rents should be considered to attract tenants and activate the street.

#### *Uses and delivery*

- The panel commends both Haringey Council and the project team for bringing forward a one hundred per cent affordable housing development.
- Positive features of the proposal – including climate resilience, number of homes per core, and inset balconies – should be embedded in the drawings and the delivery strategy. The panel also encourages Haringey Council to retain the project team to ensure that the design quality presented is also delivered.



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- The workspaces at ground and first floor levels are a positive way to activate the development and Coburg Road. To find suitable tenants quickly and achieve a vibrant streetscape, the panel recommends designing the units to be as flexible as possible. The council should also consider offering spaces at low or no rents.
- The range of tenants could be curated with Haringey's regeneration team to connect to activities in the wider neighbourhood. For example, one space could be an artist's studio for those contributing to the refurbishment of Penstock Tunnel.
- Equally, the play space provision may not meet the needs of the anticipated child yield for a scheme of this tenure and density. A freely accessible indoor play space could be provided in one of the ground floor units.

### *Site layout and masterplan*

- The panel would like to see the tower and massing on the southeastern corner of the site moved westwards to allow more generous public space on the corner of the site and retention of the existing tree. Given the Crossrail 2 constraints, this may require a rebalancing of massing on the site.
- The existing two-storey buildings on the southern and northern corners are not included in the development. However, they balance the density of the proposal, which builds on almost the entire remaining footprint of the site.
- As the building heights in the wider site allocation have been increased beyond the intentions of the original masterplan, the undeveloped corners of this site will also offer some relief from this emerging context.
- The panel understands that the corner sites are not currently within the project team's control, but suggests producing a few high-level options showing how they could best support the scheme and the wider masterplan.
- In the long-term, if the southern and northern corner sites become available, the panel recommends that they are used for wrap-around, green spaces, rather than developed for more housing.
- The resident amenity space, particularly children's play, would be more successful at ground floor level, improving accessibility and surveillance.
- Raphael House, on the southern corner site, would be a good location for a green open space. This could offer play space and bike storage at ground level. It could also have landscaping linking through Penstock Tunnel to Alexandra Park.



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### *Height and massing*

- The panel is comfortable with the proposed height and massing, which has been well tested with the emerging townscape cluster of taller buildings.
- However, the 22-storey tower is very close to the future 27-storey tower on the site immediately to the southeast. Moving it westwards towards the eight-storey wing would allow glimpses through to Chocolate Factory Square.
- The panel understands that the potential future Crossrail 2 tunnel beneath the site is a technical constraint on the location of the tallest block, but asks for further work to be carried out to push this further and safeguard space on the southeastern corner.

### *Public realm*

- The panel acknowledges that the southern side of Coburg Road is not within the site ownership, but the success of the scheme relies on these street trees. The wider masterplan for the area also establishes Coburg Road as a tree-lined boulevard, which will be an essential feature of the new neighbourhood.
- For residents arriving home, the quality of Coburg Road will shape their arrival experience. The public realm should be approached as one coherent space, and the panel asks for assurance that the street trees will be delivered.
- The junction of Coburg Road and Clarendon Road is an important nexus in the street network, between the new civic spaces of Chocolate Factory Square and Clarendon Square. The panel urges the retention of the existing mature trees on this corner, which provide shade and aid wayfinding.
- The corner should also be sufficiently generous to lead people towards the new civic spaces and routes onwards. It does not have to be large, but should create a moment for pausing and should aid orientation.
- The panel is not convinced that the two-storey colonnade at the base of the building fits in with the area. The colonnade is also not deep enough to accommodate spill-out activity, or to act as part of the public pavement. The panel should look at successful precedents, such as those found in Italian cities, to inform the design. A solution for the ground floor treatment, that better addresses the site, is needed.
- The panel is concerned that the planting proposed under the colonnade will not thrive without an irrigation system, and will need a lot of maintenance. However, there is a need to green the lower levels of the building, particularly if the mature existing trees are removed.
- The panel suggests providing climbers up the building façades instead of planters under the colonnade. These are more likely to survive and contribute to urban greening, and will save space.



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- The maisonettes with individual front doors and landscaping onto New Street are welcome. The project team should design realistic front gardens, embedding low maintenance, deliverable green space into the scheme so that it will not be removed in value engineering processes, and will contribute to the character of New Street.

### *Podium garden*

- The project team has achieved a podium garden that meets the required amenity and play space quantity for a dense development. However, the quality should be improved during the next design stage, particularly as it is the only amenity provision on the site.
- The panel asks that the views from the podium garden over the future Chocolate Factory Square, and the wider views to Alexandra Palace and Park, are safeguarded, even if the corner sites are redeveloped in the long-term.
- If these corner sites are developed beyond two storeys, the podium garden will be enclosed on all sides. This is likely to cause issues with overshadowing and acoustics, making the garden less usable and preventing residents from opening their windows. The podium should be kept as open as possible.
- The internal access to the podium garden involves long and narrow corridors. This should be simplified. The lobbies by the garden entrances should also be more generous to create a sense of arrival for residents.
- The project team should check that the podium garden space and all resident balconies will be usable, given the overshadowing likely from the future 27-storey tower immediately to the south on the Alexandra Gate site.
- A significant irrigation system and sufficient loading would need to be integrated into the podium garden design for it to achieve the project team's verdant vision, which includes grass and trees. Given the cost implications, combined with climate change, there is a danger that this approach will fail and be replaced by artificial grass or similar.
- The panel recommends instead designing low-maintenance landscaping from the outset that does not require high water consumption. This can still create an attractive and usable garden, and will be more climate resilient too.
- The maintenance of landscaping is fundamental to the scheme's success. The panel asks Haringey Council and the project team to put a management plan in place, including a process to procure high-quality landscape contractors.



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### *Housing*

- The panel supports the proposed number of homes per floor and per core in the towers, and is pleased to see inset balconies provided. Both measures help to create higher-quality, more liveable homes.
- It is also positive that the maisonettes have their own front doors, and that deck access is proposed for part of the scheme. These design choices foster a sense of home and neighbourliness. The project team should explore whether deck access can be applied to other parts of the development too.
- The panel asks that the physical, social and psychological aspects of tall and dense housing are investigated. The design should nurture a strong vertical community, focusing particularly on thresholds and meeting points, such as entrance lobbies and lifts.
- The panel also suggests engaging with the project teams of the recently completed Clarendon Gasworks masterplan immediately to the south, and learning from their post-occupancy evaluation.

### *Architecture and materiality*

- The chamfered corners of the two tower blocks result from the technical loading constraints of the potential Crossrail 2 tunnel. However, they contribute to the character of the scheme.
- To establish a more intentional relationship, the panel recommends that the chamfers should face each other across the podium garden. The chamfer on the 14-storey tower should also be more pronounced, and more legible from ground level.
- The project team should develop a consistent treatment to the two-storey base, potentially exploring wrapping the colonnade around all sides of the building, or developing a more appropriate solution for the site.
- Further work is needed to resolve the junction between the 22-storey tower and the eight-storey wing. The panel suggests finding a simple solution, perhaps with the tower extending to meet the ground.
- The elevations are developing well, but the panel asks for the emphasis either on horizontality or verticality to be clarified.
- The materials and colour palettes selected are a successful combination. It will be important to select a robust, attractive brick that works with the proposed tones and textures.
- The rooftop designs should be developed, considering parapets or screening for any protruding plant equipment, photovoltaic panels or lift overruns.



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### *Sustainability*

- Sustainability has informed design decisions, and has been successfully embedded. This dialogue should be maintained as the scheme develops.
- The panel supports the use of external blinds or shutters to mitigate overheating. The project team should investigate how successful this strategy has been on recently delivered schemes, such as the BBC Television Centre affordable housing development by Maccreeanor Lavington.
- Further thinking is required about water management. Considering the extent of hard-standing, both in the current and emerging contexts, the landscape proposals should be developed to mitigate water run-off.

### *Next steps*

- The Haringey Quality Review Panel would welcome the opportunity to comment on the scheme again at an Intermediate Review, once the landscape and sustainability proposals have been developed further.



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**Appendix: Haringey Development Management DPD**

**Policy DM1: Delivering high quality design**

**Haringey Development Charter**

- A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:
- a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
  - b Make a positive contribution to a place, improving the character and quality of an area;
  - c Confidently address feedback from local consultation;
  - d Demonstrate how the quality of the development will be secured when it is built; and
  - e Are inclusive and incorporate sustainable design and construction principles.

**Design Standards**

Character of development

- B Development proposals should relate positively to their locality, having regard to:
- a Building heights;
  - b Form, scale & massing prevailing around the site;
  - c Urban grain, and the framework of routes and spaces connecting locally and more widely;
  - d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
  - e Rhythm of any neighbouring or local regular plot and building widths;
  - f Active, lively frontages to the public realm; and
  - g Distinctive local architectural styles, detailing and materials.



## **APPENDIX 6 - DEVELOPMENT MANAGEMENT FORUM MINUTES**

**Notes of DM Forum held on MS Teams on 2<sup>nd</sup> October 2025 attended by John Miles from the Parkside Malvern Residence Association (PMRA)**

- The Parkside Malvern Residence Association (PMRA) are involved with developments in Clarendon
- The buildings are too high
- Very dense development
- Collage Arts needs to be considered
- The filter beds through Penstock Tunnel should be reviewed
- What will make up the 10% BNG?
- There is opportunity to take out a building and create a through route for walking/cycling
- Loss of natural view of the sky
- How will surface water management be dealt with as the site is in the Moselle flood basin
- Could there be swales provided on roofs/Coburg Road?

## **APPENDIX 7 - PSC PRE-APP BRIEFING MINUTES**

**PPA/2025/0002 Mallard Place, Coburg Road, Wood Green N22 6TS**  PDF 3 MB

**Proposal:** Preapplication proposal for redevelopment of the site by the erection of a 22 storey building with 8 storey wing, and a 14 storey building with 6 storey wing, to provide 150 social rent dwellings along with double height affordable workspace (539 sqm). The proposal also includes landscaped public realm.

**Minutes:**

Valerie Okeiyi, Principal Planning Officer, introduced the item.

The pre-application site is located at Mallard Place on Coburg Road, and is known as 'Chocolate Factory Phase Two'. The proposal seeks to redevelop the site with a 22-storey building and eight-storey wing, alongside a 14-storey building with a six-storey wing, providing 150 social rent dwellings. It also includes double-height affordable workspace, landscaped public realm, and associated facilities.

The site is bounded by Raphael House to the west, Kingfisher Place to the east, and the Chocolate Factory Phase One development to the north, which had already received planning permission for mixed use. At the time, the site was partially occupied by Area 51 Education, a specialist college.

The scheme forms part of site allocation SA19 within the Wood Green Cultural Quarter, which aims to deliver employment-led mixed-use development and high-quality urban realm. The proposal includes a housing mix of one- to four-bed units, affordable workspace, refuse and cycle storage, podium courtyards with play space, green roofs, landscaping, and 12 blue badge parking bays.

The Applicant stated:

- The site lies between the Clarendon Gas Works and the Chocolate Factory developments, with part already holding planning permission. Its design was shaped by nearby transport links and safeguarding lines, requiring taller, slimmer towers. The layout included bike storage, a podium garden, commercial units, and workspace along Coburg Road, with flats arranged efficiently across the towers. Visuals showed the scheme's scale in relation to surrounding developments. The presentation concluded by noting that the project would deliver 150 new council homes at council rent, with an application expected before year's end.

The following was noted in response to questions to the applicant:

- Concerns were raised about whether the 12 accessible parking bays in adjacent areas might cause parking problems for local residents and lead to objections.
- Members welcomed the principle of providing social rent homes in this location
- Members noted that, apart from one home, all dwellings would be dual aspect, which is rare among developments, and welcome.
- Members sought confirmation on building materials, observing that the images suggested render rather than brick, which they considered might be unsuitable. It was clarified that the block would use patterned brickwork with varied balcony materials.
- Questions were raised about which buildings would be demolished and whether the Prime Depot would be relocated. It was confirmed that the church and Prime Depot units would be retained, while the Area 51 Education Centre would be demolished. The Council was still discussing a relocation strategy for existing uses, but no final decision had yet been made.

Planning Sub Committee

## REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

### 1. APPLICATION DETAILS

**Reference Number:** HGY/2025/0930

**Ward:** Tottenham Hale

**Address:** Berol Quarter, Ashley Road, Tottenham Hale, London, N17 9LJ

**Proposal:** Application made under Section 73 of the Town and Country Planning Act 1990 to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted 03/03/2025.

Permission is sought to alter the permitted level of affordable housing to change 60 intermediate affordable homes to market sale.

Permission is also sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels (shifting the openings to the centre of the room).

**Applicant:** Berol Quarter Limited (Berkeley Square Developments)

**Ownership:** Private

**Case Officer:** Philip Elliott

**Date received:** 07/04/2025

1.1 This application has been referred to the Planning Sub-Committee for decision as the planning application is a major application that seeks significant change to the affordable housing obligation agreed previously under s106 agreement.

### 1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal is for amendments to the Berol Quarter planning permission (reference HGY/2023/0261).
- The amendments include a design change to include inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels – shifting the openings to the centre of the room. All other aspects of the design and proposal remain unchanged except for the amount of affordable housing that is proposed.
- Permission is sought to remove the affordable housing obligations secured in the associated section106 (s106) legal agreement to planning permission

reference HGY/2023/0261 by deed of variation (DoV), due to current market conditions that make the delivery of on-site affordable housing unviable.

- This would result in 60 intermediate affordable homes being changed to market sale. The sixty (60) affordable homes included twelve (12) 2-bed and six (6) 3-bed London Living Rent (LLR) homes; twenty-six (26) 2-bed homes let at 75% of market rent and sixteen (16) 3-bed homes let at 65% market rent (Discount Market Rent (DMR)).
- A viability assessment has been independently reviewed and confirms that the development is unable to provide any affordable housing. This could be reviewed by way of early, break and late stage review mechanisms to assess whether any such housing, or a contribution towards affordable housing off-site, could be achieved in the future.
- However, the applicant has offered to make a Payment in Lieu (PiL) to the Council to provide affordable housing in the sum of £1,534,050.00 (£7,305 per unit) to compensate for the removal of the Review Mechanisms. This is accepted as it gives more certainty to the Council and applicant and the contribution can be put towards Haringey's Council house building programme.
- If 2 Berol Yard is not completed within 50 months of commencement then the applicant will also be required to pay an Additional Affordable Housing Payment of over £150,000 for each year completion is delayed by.
- All the other public benefits of the permitted scheme would remain including:
  - A high quality designed housing and commercial development with 210 market homes and over 6,000sqm of commercial floorspace
  - A high quality landmark tall building that was supported by the Quality Review Panel (QRP)
  - Significant new employment opportunities during construction and once completed
  - Submission of a Commercial Strategy identifying how the proposed uses would complement and enhance the commercial offer in Tottenham Hale, including the creation of employment opportunities and contributing to the local economy
  - Employment and skills obligations including: 20% of the workforce employed during construction to comprise Haringey residents, the provision of skills-based training for 25% of those employed, employment of full-time apprenticeships up to 10% of workforce, and contribution to apprenticeship support
  - A new 161sqm community cultural and arts space to be let rent free for 3 years and subsequently at 80% of market rate for an agreed period up to 15 years
  - A new bridge head to support the delivery of a potential future bridge over Watermead Way and the railway into Hale Village
  - Submission of a feasibility study for the bridge over Watermead Way and the railway, including design options and secure by design principles in consultation with the Metropolitan Police

- A new public square and outdoor arts space to display local artworks and sculptures, which will be enhanced by a public lighting display
- Public realm improvements to further enhance the new District Centre and Ashley Road South including new tree planting and landscaping contributing to an increase in urban greening and biodiversity
- Estimated carbon offset of £327,750.00 for the whole development (to be reviewed once the amended energy statement has been assessed)
- Berol House Relocation Strategy - Submission of a relocation strategy to identify how existing occupants within Berol House would be supported to find new suitable premises
- £25,000 National Health Service (NHS) Contribution
- S106 obligations and Mayoral and Local CIL (in excess of £4.7 million) to contribute towards infrastructure improvements within the Borough and London as a whole

## **2. RECOMMENDATION**

- 2.1 That the Committee authorise the Head of Development Management and Planning Enforcement or the Director of Planning & Building Standards to GRANT planning permission subject to the conditions and informatives set out below and the completion of a legal agreement/Deed of Variation satisfactory to the Head of Development Management and Planning Enforcement or the Director of Planning & Building Standards securing the obligations set out in the Heads of Terms below and subject to referral to the Mayor of London and any direction they make.
- 2.2 That the agreement referred to in resolution (2.1) above is to be completed no later than 01/05/2026 or within such extended time as the Head of Development Management and Planning Enforcement or the Director of Planning & Building Standards shall in their sole discretion allow.
- 2.3 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.2) above, planning permission be granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.4 That delegated authority be granted to the Head of Development Management and Planning Enforcement or the Director of Planning & Building Standards to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions and informatives (planning permission) as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Planning Sub-Committee.

- 2.5 Summary of the heads of terms for the development are summarised below, it is noted that the legal agreement would be a deed of variation to the agreement associated with HGY/2023/0261 - with amendments made only to the relevant sections relating to affordable housing:

The on-site affordable housing (Discount Markt Rent - DMR and London Living Rent - LLR) and affordability obligations would be removed and the following added:

Affordable housing obligation updates

- A financial contribution/PiL in lieu of the early, development break, and late-stage viability review mechanisms calculated at £7,305 per unit, equating to a total contribution of £1,534,050.00. To be paid in two equal tranches: on commencement of 2 Berol Yard and 18 months thereafter.
- Associated changes to clawback, viability information, DEN connection costs, and formulas.
- Additional Affordable Housing Payments of £153,405 per year for each year completion of 2 Berol Yard is delayed by, beyond 50 months from commencement.

- 2.6 Summary of the recommended conditions for the development is provided below:

**Conditions Summary** – (the full text of recommended conditions is contained in Appendix 1 of this report).

- 1) Time limit to reflect time limit granted for HGY/2023/0261 (Compliance)
- 2) Approved Plans and Documents (Compliance)
- 3) Phasing Plan (PRE-COMMENCEMENT)
- 4) Accessible Accommodation (Compliance)
- 5) Commercial Unit - Opening Hours (Compliance)
- 6) Commercial Units - Class E Only (Compliance)
- 7) Quantum of development (Compliance)
- 8) BREEAM Certificates (PRE-COMMENCEMENT)
- 9) Residential – Noise Attenuation (Compliance)
- 10) Residential – Noise Attenuation from commercial (Pre-occupation)
- 11) Fire Statement (Pre-superstructure)
- 12) Landscape Details (Pre-occupation)
- 13) Playspace (Pre-occupation)
- 14) Surface Water Drainage (Pre-occupation)
- 15) Surface water network (Thames Water) (Pre-occupation)
- 16) Water network capacity (Thames Water) (Pre-occupation)
- 17) Flood Warning and Evacuation Plan (FWEP) (Pre-occupation)
- 18) Water Efficiency Condition (Compliance)
- 19) Biodiversity (Pre-occupation)
- 20) Lighting (Pre-occupation)
- 21) External Materials and Details (Pre-superstructure)

- 22) Living roofs (Pre-superstructure)
- 23) Landscape and ecological management plan (LEMP) (Pre-occupation)
- 24) Energy Strategy (Pre-superstructure)
- 25) DEN Connection (Pre-superstructure)
- 26) Overheating (Pre-superstructure)
- 27) Overheating Building User Guide (Pre-occupation)
- 28) Circular Economy (Pre-occupation)
- 29) Whole Life Carbon (Pre-occupation)
- 30) Secured by Design (Pre-occupation)
- 31) Written Scheme(s) of Investigation for Archaeology (PRE-COMMENCEMENT)
- 32) Land Contamination (PRE-COMMENCEMENT)
- 33) Unexpected Contamination (If identified)
- 34) Car Parking Management Plan (Pre-occupation)
- 35) Cycle Parking (Pre-superstructure)
- 36) Delivery and Servicing Management Plan (Pre-occupation)
- 37) Site Waste Management Plan (PRE-COMMENCEMENT)
- 38) Waste Management Plan (Pre-occupation)
- 39) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
- 40) London Underground Asset Protection (PRE-COMMENCEMENT)
- 41) Public Highway Condition (PRE-COMMENCEMENT)
- 42) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
- 43) Updated Air Quality Assessment (Pre-superstructure)
- 44) Management and Control of Dust (PRE-COMMENCEMENT)
- 45) Combustion and Energy Plant (Compliance)
- 46) Business and Community Liaison Construction Group (PRE-COMMENCEMENT)
- 47) Telecommunications (Compliance)
- 48) Wind Mitigation (Pre-Superstructure)
- 49) Noise from building services plant and vents (Compliance)
- 50) Anti-vibration mounts for building services plant / extraction equipment (Compliance)
- 51) Signage and wayfinding (Pre-occupation)
- 52) Berol House Blue Badge Parking (Pre-occupation)
- 53) Public Art (Pre-occupation)
- 54) Residential homes to be C3 use only (Compliance)

2.7 Summary of the recommended informatives for the development is provided below:

**Informatives Summary** – (the full text of Informatives is contained in Appendix 1 to this report).

- 1) Working with the applicant

- 2) Community Infrastructure Levy
- 3) Hours of Construction Work
- 4) Party Wall Act
- 5) Numbering New Development
- 6) Asbestos Survey prior to demolition
- 7) Dust
- 8) Written Scheme of Investigation – Suitably Qualified Person
- 9) Written Scheme of Investigation - Deemed Approval Precluded
- 10) Maximise Water Efficiency
- 11) Minimum Water Pressure
- 12) Paid Garden Waste Collection Services
- 13) Sprinkler Installation
- 14) Designing out Crime Officer Services
- 15) Land Ownership
- 16) Site Preparation Works
- 17) s106 Agreement and s278 Agreement
- 18) Revised Fire Statement required with any revised submission
- 19) Building Control
- 20) Building Regulations – Soundproofing
- 21) Thames Water – Sewage Pumping Station

- 2.8 In the event that members choose to make a decision contrary to officers' recommendation, members will need to state their reasons.
- 2.9 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the agreed time period, set out in (2.2) above, the planning permission be refused for the following reason:
- 2.10 In the absence of a deed of variation securing a financial contribution/PiL calculated at £7,305 per unit, equating to a total contribution of £1,534,050.00 the proposal would fail to deliver the maximum reasonable amount of affordable housing and would be contrary to policies H4 'Delivering affordable housing', and H6 'Affordable housing tenure' of the London Plan 2021 and policy SP2: 'Housing' of the Local Plan 2017.
- 2.11 In the event that the Planning Application is refused for the reason set out above, the Head of Development Management and Planning Enforcement or the Director of Planning & Building Standards (in consultation with the Chair of Planning Sub-Committee) is hereby authorised to approve any further application for planning permission which duplicates the Planning Application provided that:
- i. There has not been any material change in circumstances in the relevant planning considerations, and
  - ii. The further application for planning permission is submitted to and approved by the Head of Development Management and Planning Enforcement or the

- Director of Planning & Building Standards within a period of not more than 12 months from the date of the said refusal, and
- iii. The relevant parties shall have previously entered into the agreement contemplated in resolution (2.1) above to secure the obligations specified therein.

## **CONTENTS**

- 3) PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS
- 4) CONSULTATION RESPONSES
- 5) LOCAL REPRESENTATIONS
- 6) MATERIAL PLANNING CONSIDERATIONS
- 7) COMMUNITY INFRASTRUCTURE LEVY
- 8) RECOMMENDATION

## **APPENDICES:**

- Appendix 1: Planning Conditions & Informatives
- Appendix 2: Report to Planning Sub-Committee (PSC) for HGY/2023/0261
- Appendix 3: PSC Report Appendices for HGY/2023/0261 (Not including Conditions which are superseded by Appendix 1)
- Appendix 4: Addendum Report to PSC for HGY/2023/0261
- Appendix 5: Minutes of PSC meeting for HGY/2023/0261
- Appendix 6: GLA Stage 1 Report 19 May 2025
- Appendix 7: Carter Jonas Review of Applicant's Financial Viability Assessment on behalf of LB Haringey June 2025
- Appendix 8: GLA Assessment of Financial Viability 14 August 2025
- Appendix 9: DS2 Response 25 September 2025
- Appendix 10: Carter Jonas Rebuttal Response October 2025
- Appendix 11: GLA Viability Team Comments 28 November 2025
- Appendix 12: Internal and external consultation responses
- Appendix 13: Neighbour representations and officer responses
- Appendix 14: DS2 Response 16 January 2026
- Appendix 15: GLA Viability Team Comments 27 January 2026
- Appendix 16: Design Changes to top floor

## PROPOSED DEVELOPMENT AND SITE LOCATION DETAILS

### Proposed Development

3.1 The application is submitted under section 73 (s73) of the Town and Country Planning Act (TCPA) to amend the previously granted planning permission. If granted, the s73 application would be a new planning permission but all conditions on the original permission would be reapplied (albeit updated as necessary). The time limit for implementing the permission would be the same as the original permission (03/03/2028).

3.2 The proposal is very similar to the original planning permission reference HGY/2023/0261 which was for:

*Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.*

3.3 Members resolved to grant the above at the Planning Sub Committee meeting held on Monday 3rd July 2023. The scheme was subsequently granted planning permission on 3<sup>rd</sup> March 2025 once the s106 had been completed.

3.4 Planning permission HGY/2023/0261 allowed the refurbishment and extension of Berol House to provide workspace and retail accommodation; and for a new mixed use building comprising Build to Rent (BtR) homes and commercial, retail, and community spaces at 2 Berol Yard.

3.5 The current scheme proposes the following two changes to the extant planning permission reference HGY/2023/0261 relating to the design and affordable housing:

#### Design

- The replacement of glass panels with inward opening doors at roof level of 2 Berol Yard; and

#### Affordable housing

- The removal of the affordable housing obligations secured in the associated s106 to HGY/2023/0261 by deed of variation.

3.6 As part of the extant scheme (planning permission reference HGY/2023/0261) 35% affordable housing was secured based on habitable rooms. This resulted in 60 affordable homes being secured (out of a total of 210 homes); 30% of the 35% total affordable housing provision was secured at London Living Rent (LLR). The remainder was secured at a discount to market rent (DMR).

- 3.7 The DMR that was secured included 2-bed homes let at 75% of market rent, and 3-bed homes let at 65% of market rent. This resulted in twenty-six 2-bed homes let at 75% of market rent and sixteen 3-bed homes let at 65% of market rent. The LLR element included twelve 2-bed and six 3-bed homes.
- 3.8 Across London, the average monthly rent for a two bedroom London Living Rent (LLR) home to be let in 2025-26 is approximately £1,350 a month, equivalent to just under two thirds of the average market rent in December 2024 (£2,118) as reported by the Office for National Statistics. The rent for a three bedroom LLR home is set at no more than 10 per cent above the two bedroom rent.
- 3.9 For the DMR (2-bed homes let at 75% of market rent, and 3-bed homes let at 65% of market rent) current rents for a 2-bed flat at The Gessner range from £2,744 – £3,000pcm, with an average rent of £2,860pcm. Therefore, the DMR rent for a 2-bed home in the development would be approximately £2,145. For 3-beds, the mean average rent last May was £3,695, so at 65% DMR Apportionment the rent would be £2,402.
- 3.10 The application is submitted under Section 73 of the Town and Country Planning Act 1990 (s73) which can be used to make a material amendment by varying or removing conditions associated with a planning permission. Amendments are sought to Condition 2 of HGY/2023/0261 to amend the approved plans.
- 3.11 Agreement is also sought to modify the s106 associated with HGY/2023/0261 through a deed of variation (DoV) to remove the affordable housing and affordability obligations and secure a financial contribution/PiL calculated at £7,305 per unit, equating to a total contribution of £1,534,050.00 to ensure the maximum amount of affordable housing can be secured.
- 3.12 The applicant has advised that due to current market conditions the on-site affordable housing provision granted under extant planning permission HGY/2023/0261 is no longer financially viable and the scheme cannot be delivered with the affordable housing included as part of the overall development.
- 3.13 The applicant has submitted a Financial Viability Assessment (FVA) to evidence this situation and to support the submission. This has also been scrutinised by the Council's own expert advisors and officers which is explained later in the report.
- 3.14 Figure 1 below shows the application site outlined in a dashed red line with the proposed buildings highlighted red:

*Figure 1 - Berol Quarter site plan*



3.15 The extant planning permission HGY/2023/0261 consists of the following three main components:

### **1. Berol House**

Retained to the west of the site. Planning permission was granted for the building to be refurbished, and a three-storey extension erected at roof level covering the full extent of the roof plane on two of the three new floors; with a third floor set back at the north and south, and to a lesser extent to the east. An undercroft pedestrian route through Berol House (known as Berol Passage) was incorporated to increase west-east permeability through the building.

### **2. Berol Yard**

Located to the east of Berol House at the eastern part of the site. Planning permission was granted for a 32 storey high building with a lift overrun core rising above the highest part of the main building, with upper floors rotated at an angle to the ground floor.

The western elevation of the ground floor runs parallel with Berol House with a 10.5m gap forming a new street between the two. The southern elevation runs parallel with the One Ashley Road building to the south with a minimum distance

of 10.2m. The eastern elevation runs parallel with Watermead Way to the east with the northern elevation running parallel with The Gessner to the north.

**3. Public Realm**

Paving, street planting, and street furniture was granted planning permission to connect the buildings on the ground floor, with a new public square located to the southwest corner of the site, creating a focal and navigation point for visitors and pedestrians.

*Land use & housing mix*

- 3.16 Planning permission was granted for a mix of residential and non-residential floorspace. 2 Berol Yard comprised 604sqm of Class E ('Commercial, Business and Service') accommodation expected to comprise shops, cafes, and restaurants at ground floor level and 160.2sqm of community space at first floor level. It included 210 homes on floors 1 to 29, and associated amenity space on the podium and at level 30 in the form of a sky terrace.
- 3.17 Berol House comprised 5,492sqm (GIA) of Class E floorspace ((3,294sqm (existing) and 2,198sqm uplift));with 428sqm of amenity space on the roof. In total, the site proposes 6,359sqm (GIA) of Class E and F2 (community) floorspace.
- 3.18 210 Build to Rent (BtR) homes were granted permission at 2 Berol Yard. Berol House did not include residential development. The total residential floorspace granted at 2 Berol Yard was 24,016 sqm.
- 3.19 The dwelling mix, home size and home quantity are set out in Table 1 below providing a mix of one, two, and three-bedroom homes. 10% of the total new homes are wheelchair accessible/adaptable homes. This equates to 22 wheelchair adaptable new homes.

*Table 1 – Permitted Dwelling Mix*

Flat type	No. of homes	% of homes	Wheelchair/accessible homes
Studio	20	10%	16
1 Bed	48	23%	
2 Bed 3 Person	21	10%	0
2 Bed 4 Person	93	44%	
3 Bed 5 Person	17	8%	6
3 Bed 6 Person	11	5%	
<b>Total</b>	<b>210</b>	<b>100%</b>	<b>22 (10%)</b>

- 3.20 Additional information on height, scale, and massing; 2 Berol Yard block heights; materials and detailed design; public realm; amenity and play space; access, servicing, and parking; cycle parking; and deliveries and servicing can be found in Appendix 2 in the 'proposed development' section.

### Site Location Details

- 3.21 The application site comprises 2 Berol Yard, which is currently a vacant plot of land adjacent to Watermead Way; and Berol House, the former Berol pencil factory, which is now an existing office building that runs north-south along Ashley Road. The site forms an L-shaped parcel of land with a total area of 2.67 hectares.
- 3.22 2 Berol Yard is currently a vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Part of the car park is currently being utilised for the construction of the 'One Ashley Road' scheme (part of the Related Argent 'Heart of Hale' development), which is located to the south of the site.
- 3.23 Berol House is a three-storey locally listed building. The building was constructed in the early 1900s, having been fully completed by 1913. The building was a former pencil factory owned by the Berol Company who produced Berol pencils at the site. Currently, Berol House is used as a serviced office building.
- 3.24 The Berol Yard site (which includes Berol House, 2 Berol Yard, and The Gessner – See Figure 2) has planning permission for redevelopment under HGY/2017/2044 which is described in the relevant planning history section below.
- 3.25 The site is bounded as follows:

To the north

by the 'Cannon Factory' which has planning permission for new homes and commercial space, as part of the Notting Hill Genesis/Home Ownership outline application (HGY/2016/4165). Beyond this is the Harris Academy, which provides secondary education for 11–18-year-olds, and is due to increase in capacity up to 1,500 students;

To the northeast

by 'the Gessner' which comprises 166 build to rent (BtR) homes and commercial floorspace and was recently completed by the Applicant;

To the east

by Watermead Way, and beyond this the railway line and Hale Village;

To the south

by 'One Ashley Road', which has recently been constructed and was delivered by Related Argent as part of their 'Heart of Hale' development. One Ashley Road comprises two residential towers with the first three floors being retail and office space. Further south lies Tottenham Hale Station and the Tottenham Hale

District Centre as well as Tottenham Hale Retail Park on the opposite side of Ferry Lane; and

To the west

by Ashley Road and the development plots of Ashley Gardens, Ashley House and Ashley Park which will provide new residential accommodation. Down Lane Park is located further west and northwest and is within a 2-minute walking distance of the site.

*Transport*

- 3.26 Vehicular access to the site is from Ashley Road to the west which connects to Hale Road (A503) / Watermead Way (A1055) to the south.
- 3.27 The access to Ashley Road from the south is proposed to be amended as part of wider highway improvements to the District Centre and Ashley Road. The improvement works would make the street one-way. A new loading bay adjacent to the east of the site on Watermead Way has been installed as part of works under planning permission HGY/2017/2044.
- 3.28 The site has a Public Transport Accessibility Level (PTAL) rating of 5 to 6a (where 1 is least accessible and 6b is most accessible); so is considered to have very good to excellent accessibility. Tottenham Hale Underground Station is 180m from the site.
- 3.29 The site is also close to Tottenham Hale Bus Station.

*Heritage*

- 3.30 The closest Conservation Areas to the site (Tottenham High Road Historic Corridor – Tottenham Green, Bruce Grove, & Seven Sisters/Page Green) are at the High Road approximately 500m away to the west. Similarly, the nearest listed buildings are 62 Monument Way N17 which is approximately 450m away from the site and Tottenham High Cross on the High Road further west.
- 3.31 The site is within Flood Zone 2 (the zone of moderate flood risk) and within an Air Quality Management Area (AQMA). The site is within the Tottenham Hale Growth Area and Tall Building Growth Area. It also falls within a Local Employment Area: Regeneration Area and allocated site TH6: Ashley Road South Employment Area within the Tottenham Area Action Plan (TAAP).

*Surroundings*

- 3.32 The surrounding area is characterised by the site's immediate context within the Ashley Road South Masterplan (ARSM) and Tottenham Hale Housing Zone. The southern end of the site (south of the southern elevation of Berol House) falls within the emerging new Tottenham Hale District Centre. Figure 2 below shows the layout of the ARSM.

3.33 Across Tottenham Hale there have been several planning permissions:

- *GLS Supplies Depot, Ferry Lane [Hale Village] (HGY/2006/1177) - Demolition of all structures and remediation for the development of a mixed use scheme comprising up to 1210 residential units (Use Class C3), student accommodation (C2), office (B1), hotel (C1), retail (A1, A2, A3, A4, A5 and B1) uses, a health centre (D1), a health club (D2), crèche (D1) and a primary school, with provision for underground and on-street car parking, to be comprised within separate building blocks ranging in height from 1 to 18 storeys, incorporating public open space, an unculverted watercourse and Combined Heat and Power (CHP) with associated renewable energy systems (outline application). [Constructed and occupied]*
- *Image House, Station Road [Premier Inn Hotel] (HGY/2014/0498) - A 96 bed hotel (Class C1) including a 146sqm restaurant/bar, 3 disabled car parking spaces and 6 dedicated cycle spaces. [Constructed and in use]*
- *Hale Wharf (HGY/2016/1719) - Outline planning permission (for the entire site) for a residential led mixed use development comprising the demolition of existing buildings and structures; the construction of buildings across the site to include residential (up to 505 units) and flexible retail or business uses (Use Classes A1-A5 or B1); pedestrian/cycle footbridges, modification works to the existing vehicular access and associated highway works; refurbishment of existing infrastructure (including provision of an on-site energy centre, if required), landscaping and public realm works; new servicing arrangements; car/cycle parking; and associated and facilitating works.  
All matters are reserved for the pedestrian footbridges, Phases 2 and 3 Buildings and detailed permission is sought with no matters reserved for the Phase 1 Buildings.  
The detailed component of the application (Phase 1 buildings only) comprises the demolition of existing buildings; the construction of buildings ranging from 16 to 21 storeys to accommodate 249 residential units and 307m2 (GIA) of flexible retail or business uses (Use Classes A1-A5 or B1); modification works to the existing vehicular access and associated highway works; infrastructure (including provision of an on-site energy centre, if required), landscaping and public realm works; new servicing arrangements; car/cycle parking; and associated and facilitating works. [Constructed and occupied]*
- *1 Station Square [Millstream Tower] (HGY/2016/3932)- Demolition of existing buildings and erection of a building providing 434 sqm (GEA) of commercial floorspace (Class A1/A3), 128 residential units (Class C3), landscaped amenity space, cycle parking and all structural and associated works. [Constructed and occupied]*
- *SW Plot, Hale Village [Anthology Hale Works] (HGY/2017/2005) - Mixed use development ranging from 11 to 33 storeys comprising 1,588 sqm commercial space (flexible A1/A3/A4/B1/D1 uses), 279 residential units including*

*affordable housing, together with roof garden and associated landscaping, the provision of basement car parking, bicycle spaces, associated plant including building maintenance unit and internal refuse storage at Plot SW, Hale Village. [Constructed and occupied]*

- Strategic Development Partnership (SDP) Sites [by Related Argent] (HGY/2018/2223) - *Demolition works and clearance of existing site to provide a mixed-use development comprising 6 buildings up to 38 storeys in height, which together with pavilion and basement accommodation will provide up to 104,053m<sup>2</sup> of floorspace (GIA), comprising residential (Use Class C3) (up to 1,036 units), retail (Use Class A1-A4), health centre (Use Class D1), office (Use Class B1), leisure (Use Class D2) parking and servicing areas, hard and soft landscaping (including the provision of a new public square), highways works, creation of new vehicular accesses and the realignment of Station Road, decentralised energy network works and other associated works. [Constructed and occupied with final Ferry Island plots nearing completion]*
- 29-33 The Hale [The Hale] (HGY/2021/2304) - *Redevelopment of site including demolition of existing buildings to provide a part 7, part 24 storey building of purpose-built student accommodation [PBSA] (Sui Generis); with part commercial uses [retail] (Use Class E(a)) at ground and first floor; and associated access, landscaping works, cycle parking, and wind mitigation measures. The development includes 432 rooms of student accommodation. [Under construction]*
- Council Depot, Ashley Road [Wingspan Walk (Ashley Road Depot)] (HGY/2022/0752) - Full planning application for the erection of 272 homes including 50% socially rented homes extending 4-13 storeys, 174sqm of flexible Use Class E floorspace along with a new vehicular access to the site, car parking and two pedestrian north south routes. The proposal also includes both private and public hard and soft landscaping throughout the site. [Constructed and occupied]

3.34 The allocated sites to the south of the Ashley Road East and West (ARSM) which form allocated site TH5 have been completed; with TH4 (in part) nearing completion and under construction; and TH10 (in part – eastern end) nearing completion by Related Argent for the 'Heart of Hale' District Centre redevelopment.

3.35 The site sits within the central and southeast sections of the ARSM. The ARSM is partially bounded by Down Lane Park to the north which also wraps around the western boundary and contains a children's playground, an existing nursery, tennis courts, bowling green, and BMX track. Ashley Road runs centrally through the masterplan.

- 3.36 On the opposite side of Ashley Road to Down Lane Park is the Harris Academy Tottenham which provides primary and secondary education. The site has been redeveloped to provide additional educational facilities for the Harris Academy (planning permission reference HGY/2015/3096).
- 3.37 The reservoirs to the east of the site (approximately 450m away) are a Site of Special Scientific Interest (SSSI) and a Special Protection Area & Ramsar site.
- 3.38 The buildings which form the ARSM have been developed by the Applicant and formerly by Notting Hill Genesis/Home Ownership, who worked collaboratively to deliver a masterplan for the area. The following planning permissions are in place for the masterplan:

- **Cannon Factory and Ashley House** submitted by Notting Hill Genesis/Home Ownership. Planning permission HGY/2016/4165 was granted outline permission in 2018, with detailed planning permission granted later in the same year under reference HGY/2018/2353.

The planning permission includes the demolition of existing buildings across the two sites and redevelopment consisting of the erection of three buildings of up to 17 storeys in height, to provide up to 3,600sqm of commercial floorspace, up to 256 homes, new public realm, landscaped amenity, and all other associated works. Whilst implemented, construction has not gone beyond demolition and site clearance.

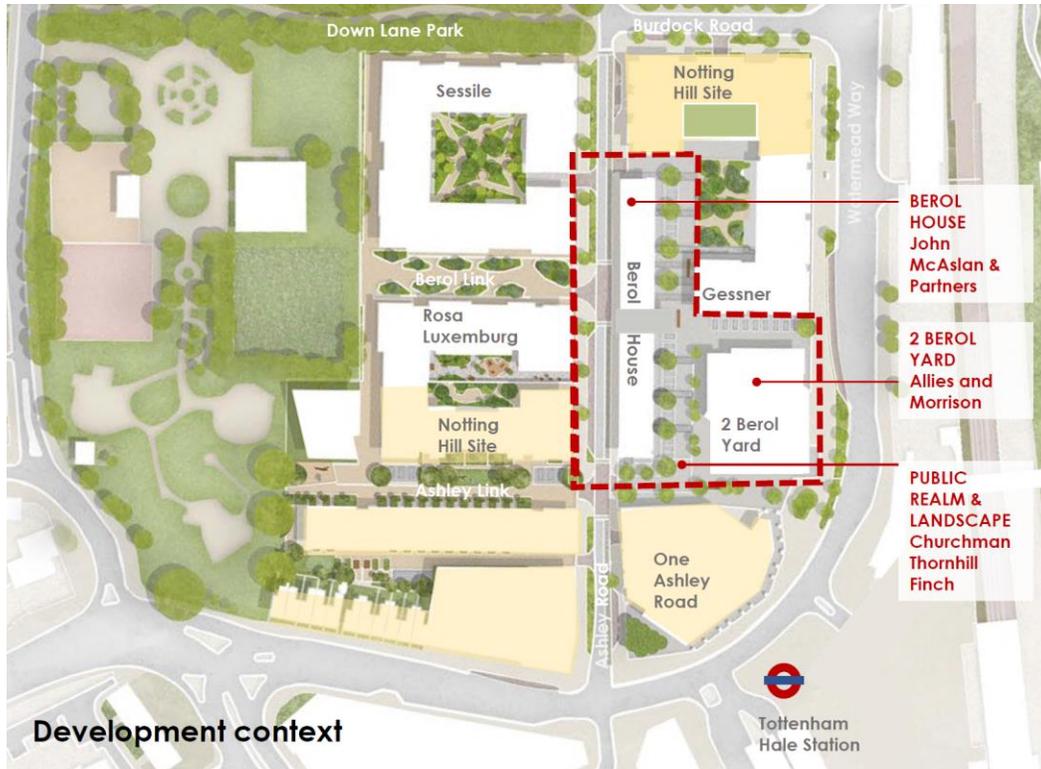
- **Ashley Gardens** comprises two residential-led mixed use buildings of up to 11 storeys, providing up to 417 homes and has been developed by the Applicant. Planning permission was approved in 2017 (HGY/2017/2045) and amended in 2019 (HGY/2019/2804) and in 2021 (HGY/2021/1170).

The first phase, known as Rosa Luxemburg Apartments, was completed in December 2021, and is now owned by the Council and the remainder of the scheme is completed and named 'The Sessile'.

- **Ashley Park** (Ashley House) comprises a part six and part eight storey residential-led mixed use building submitted by Notting Hill Genesis/Home Ownership, to deliver up to 97 homes. Planning permission was granted on appeal in April 2020 (HGY/2019/0108). Whilst implemented, construction has not gone beyond demolition and site clearance.
- **The Gessner** (1 Berol Yard) comprises a 14-storey residential-led mixed use building, developed by the Applicant. The Gessner was granted

permission in 2018 as part of a wider hybrid application (HGY/2017/2044). Works at The Gessner were completed in 2021.

Figure 2 – Layout of the ARSM with the site shown edged in red



## Relevant Planning History

### Extant parent permission - HGY/2023/0261

- 3.39 The site is subject to extant planning permission (HGY/2023/0261), which members resolved to grant at the Planning Sub Committee meeting held on Monday 3rd July 2023. The scheme was subsequently granted planning permission on 3<sup>rd</sup> March 2025 for:

*Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.*

- 3.40 The site is also subject to extant planning permission (HGY/2017/2044), which includes 1 Berol Yard (now named The Gessner), 2 Berol Yard (formerly the college site) and Berol House. Planning permission was granted on 8 June 2018 for:

*Full planning permission for the demolition of the existing buildings within the Berol Yard site and retention of Berol House. Erection of two buildings between 8 and 14 storeys providing 166 homes, 891 sqm (GEA) of commercial floorspace (Class A1/A3/B1/D1), 7,275 sqm (GEA) of education floorspace (Class D1), car and cycle parking, open space, landscaping and other associated works.*

*Outline proposals (all matters reserved) for the alteration/conversion of ground, first and second floors of Berol House with up to 3,685 sqm (GEA) of commercial floorspace (A1/A3/B1/D1) and the introduction of a two storey roof level extension introducing up to 18 homes, cycle parking and other associated works. Amendments to scheme including replacement of accommodation with "build-to-rent" and reconfiguration of internal residential and commercial layout.*

- 3.41 Reserved Matters for appearance, landscaping, layout, scale and access in relation to Berol House (pursuant to Condition 1 of planning permission HGY/2017/2044) were approved in 2020 (HGY/2020/0080). Since the original planning permission was granted there have also been several non-material amendments (under section 96a) that have been made to the scheme and conditions approved to enable part of the development.
- 3.42 The residential component at 1 Berol Yard (now known as The Gessner) and associated public realm has been completed and has been in occupation/operation since 2021. The remaining two plots of the original hybrid planning application, the development of which has not commenced, comprise 2 Berol Yard or the College Site (approved for education floorspace) and Berol

House (approved for commercial floorspace and some residential in a roof level extension).

- 3.43 The phasing strategy for Berol Yard was approved under planning permission HGY/2018/2164. Phases 1 and 2 involved the construction of The Gessner, hard landscaping from Ashley Road and between Berol House and The Gessner, and the delivery of the layby on Watermead Way. Phase 3 involved the Berol House refurbishment & extension, phase 4 completion of the public realm, and phase 5 construction of ADA College.
- 3.44 The s106 associated with planning permission HGY/2023/0261 required the outstanding phases of planning permission HGY/2017/2044 to 'fall away' should planning permission HGY/2023/0261 be implemented, in order that planning permission HGY/2023/0261 could proceed without both different elements of the consented developments being able to be constructed.

## 4. CONSULTATION RESPONSES

### Current Section 73 Planning Application Consultation

- 4.1 An officer summary of responses received to consultations is set out below. The full text of internal and external consultation responses is contained in Appendix 13.
- 4.2 Whilst all the consultees consulted under HGY/2023/0261 were consulted under this application, it is noted that due to the nature of the current section 73 proposal – constituting a minor design change and the removal of affordable housing, there were few consultee responses to the consultation. However, the following responses were received:

#### Internal responses (summarised):

##### **LBH Design –**

No design objections to these proposals.

##### **LBH Pollution / Air Quality / Contaminated Land –**

No objection to the proposed application with regards to land contamination and air quality. However, the applicant is reminded of the need to comply with the previous conditions on both grounds i.e. land contamination and air quality, as outlined in the approved planning permission.

#### External responses (summarised):

##### **Greater London Authority (GLA) / The Mayor of London –**

The full Stage 1 response can be found in Appendix 7 – The Strategic issues summary is included below:

Land use principles: The development of this brownfield site for a high-density, mixed-use development remains acceptable in principle. However, it is considered that the proposed nil affordable housing offer would conflict with London Plan Policies H4 and H5. The absence of any affordable housing materially impacts on overall planning balance of the scheme. This will be considered further at the Stage 2, if the Council resolves to grant permission.

Affordable housing: The proposal to reduce the level of affordable housing from 35% to 0% does not demonstrate compliance with London Plan Policies H4 and H6, nor is it a verified viability position. The FVA is currently being robustly scrutinised by GLA Viability Officers.

**Officer comment:** *GLA Viability Officers subsequently sent formal comments and after a number of discussions it is now agreed that the scheme could not support a contribution to affordable housing. This is discussed in Section 6 of this report.*

**Health & Safety Executive (HSE) –**

No comment.

**Metropolitan Police - Designing Out Crime Officer (DOCO) –**

No objections with the proposals and they have commented that they look forward to consultation with the design team in regard to achieving Secured by Design accreditation for the project.

## 5. LOCAL REPRESENTATIONS

5.1 On 24 April 2025, notifications were sent out as follows:

- 888 letters to neighbouring properties

5.2 A Press Advertisement was placed in the Enfield Independent on 30 April 2025.

5.3 On 26 April 2025, a site notice was erected in the vicinity of the site.

5.4 The number of representations received from neighbours, local groups etc. in response to the consultation are as follows:

Number of individual responses: 2

Support: 0

Objecting: 2

5.5 The full text of neighbour representations and officer responses are set out in Appendix 14.

5.6 The main issues raised in representations are summarised below:

Objections:

- The development economics are challenged – there are many errors in the FVA and even with the proposed changes the proposal is still not meeting viability and will continue to be “challenged financially” and couldn’t possibly be proceeding.
- Any reduction in the level of social/affordable housing is objected to.

***Officer comment:*** *The applicant’s FVA has been independently assessed on behalf of the Council by financial viability consultants Carter Jonas and by the GLA’s Viability Team who have both found that the proposal cannot support affordable housing on site or an affordable housing contribution.*

## **6. MATERIAL PLANNING CONSIDERATIONS**

1. Overview & Design Changes (6.1)
2. Affordable Housing and Viability (6.2)
3. Other matters (6.3)
4. Conclusion (6.4)

### **6.1 Overview & Design Changes**

6.1.1 The proposed changes to planning permission HGY/2023/0261 are:

- design changes (at roof level of 2 Berol Yard) and
- the removal of the affordable housing

6.1.2 All the other aspects of extant planning permission HGY/2023/0261 remain unchanged. All of these aspects were assessed in detail in the reports to the Planning Sub-Committee (PSC) and were discussed at the meeting held on Monday 3rd July 2023 where members resolved to grant planning permission. The reports to PSC, and the minutes of the meeting are included at Appendices 2, 3, & 4; and 5 respectively.

6.1.3 Since planning permission was granted on 3rd March 2025 there has been no change to the development plan and all applicable planning policies remain largely the same.

6.1.4 However, the Council has recently consulted on a Draft Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, with the consultation period running from 10 October to 19 December 2025.

6.1.5 The Draft Local Plan includes new site allocation 'TH SA04 Berol Yard' which includes the land that made up Berol Yard and the Cannon Factory site to the north. The indicative capacities and land uses proposed by the site allocation largely reflect the numerous extant planning permissions for the sites including HGY/2023/0261.

6.1.6 One of the key differences in terms of policies in the Draft Local Plan in relation to this site and the proposed development is the inclusion of a specific Build to Rent policy (Policy H4). This policy reflects the London Plan policy on Build to Rent schemes and supports standalone developments or blocks within large mixed tenure schemes. It seeks social housing and intermediate affordable housing tenures where there is more than one residential core and just DMR if not.

6.1.7 The Draft Local Plan sets out the Council's emerging placemaking framework, spatial strategy, and policy direction. At this stage, the new Local Plan is in the

early stages of preparation and has not yet been submitted for examination. In accordance with the National Planning Policy Framework (NPPF), paragraph 49, officers consider that only very limited weight should be afforded to the Draft Local Plan's policies at this time.

6.1.8 Therefore, the assessment against planning policy made under extant planning permission HGY/2023/0261 remains relevant and does not need to be assessed again or as part of this report. Instead, this report will focus on the changes (as specified above in paragraph 6.1.1) to the extant permitted scheme. See Appendices 2, 3, & 4 for the report and relevant addendum and appendices for HGY/2023/0261 for an assessment of the following matters:

- principle of the development;
- policy assessment;
- housing and policy H11 of the Local Plan 2017 (build to rent);
- impact on adjoining occupiers;
- design and tall building assessment;
- impact on heritage assets including affected conservation areas;
- quality of residential accommodation;
- social and community infrastructure;
- transportation, parking and highway safety;
- energy, climate change, and sustainability;
- urban greening and ecology;
- trees and landscaping;
- wind and microclimate;
- flood risk and drainage;
- land contamination;
- archaeology; and
- fire safety and security.

6.1.9 The design changes involve altering openings and glazing at the top floor of the tower. The appearance of the top floor would be very similar with glazing and doors, the arrangement and design of these has just been updated to move the opening to the centre of the room. The changes would not be discernible from the street and would not have undue impact on the host building or on the character and quality of the area in general.

6.1.10 The design changes at roof level of 2 Berol Yard are minor in the context of the overall development and would have little discernible impact on the building when viewed at street level. The changes would comply with development plan policies relating to design and are acceptable.

## 6.2. **Affordable Housing and Viability**

*National Policy*

6.2.1 The National Planning Policy Framework (NPPF) 2024 states that where it is identified that affordable housing is needed, planning policies should expect this to be provided on site unless off-site provision or an appropriate financial contribution can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities.

*Regional Policy – London Plan 2021*

6.2.2 Policy H4 of the London Plan 2021 also states that affordable housing should be provided on site or provided as a cash in-lieu contribution in exceptional circumstances.

6.2.3 The London Plan goes on to set out that cash in lieu contributions can be used where on-site affordable housing delivery is not practical and the contribution will not be detrimental to the delivery of mixed and inclusive communities.

6.2.4 The Mayor of London's Affordable Housing and Viability (AHV) Supplementary Planning Guidance (SPG) states that all developments not meeting a 35% affordable housing threshold should be assessed for financial viability through the assessment of an appropriate financial appraisal, with early and late-stage viability reviews applied where appropriate.

6.2.5 It also states that all schemes which propose cash in lieu payments are required to provide a detailed viability assessment as part of the justification.

6.2.6 The SPG states 'The starting point for determining in-lieu contributions should be the maximum reasonable amount of affordable housing that could be provided on-site as assessed through the Viability Tested Route. The value of the in-lieu contribution should be based on the difference in Gross Development Value arising when the affordable units are changed to market units within the appraisal.

6.2.7 This is to ensure that where the on-site component of market housing is increased as a result of the affordable contribution being provided as a cash in-lieu payment, this does not result in a higher assumed profit level for the market homes within the assessment which would have the effect of reducing the affordable housing contribution.

*Local Policy*

6.2.8 Policy SP2 of the Local Plan 2017 states that subject to viability, sites capable of delivering 10 homes or more will be required to meet a Borough wide affordable housing target of 40%, based on habitable rooms.

6.2.9 Policy DM13 of the Development Management Development Plan Document (DM DPD) 2017 reflects this approach and sets out that the Council will seek the maximum reasonable amount of affordable housing provision when negotiating on schemes with site capacity to accommodate more than 10 dwellings, having regard to Policy SP2 of the Local Plan 2017 and the achievement of the Borough-wide target of 40% affordable housing provision, the individual circumstances of the site, the availability of public subsidy, development viability; and other planning benefits that may be achieved.

#### *Assessment*

6.2.10 The Mayor's Affordable Housing and Viability SPG acknowledges the reality that developers require a competitive return in order to proceed with a scheme and to secure finance where required. Viability reviews consider residual land value methodology to determine the underlying land value once the costs of the development (including developer's profit) are deducted from the gross development value.

6.2.11 Within planning viability assessments there are two assessments of land value that are undertaken to determine whether a proposal is viable: the assessment of residual land value (RLV) and benchmark land value (BLV). The residual land value is determined through deducting development costs from development value to ascertain the underlying land value. This is then compared with the benchmark land value. The benchmark land value can be considered as the value below which a reasonable land owner is unlikely to release a site for redevelopment.

6.2.12 The NPPF's benchmark for viability appraisal is that it should '*take account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable*'. The Planning Practice Guidance (PPG) is clear that '*in all cases, land or site value should: reflect policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge.*'

6.2.13 Viability assessments refer to profit as the agreed profit suitable for a site, given the specific circumstances. Surplus and deficit are referred to as what the applicant is expected to achieve in relation to that profit i.e. if there was a deficit of 1% on a profit of 20% then the developer would still anticipate achieving 19% profit. As referenced in the Mayor's Affordable Housing and Viability SPG an agreed profit is required to ensure that the proposal can be developed.

#### *Viability review*

6.2.14 In support of the planning application, a financial viability assessment (FVA) by DS2 (the viability consultants) was submitted by the Applicant alongside supporting information. The report outlined that the development with 100%

private housing would generate a deficit of £23,718,207 against the viability benchmark. This was based on a level of profit against costs of 12.5% for the Build to Rent homes (BtR) and 15% for the commercial uses. See Table 2 below:

*Table 2 – Viability deficit*

Proposed development	DS2 (Applicant)	Carter Jonas ( LPA)
Total BLV	£10,971,043	£7,936,500
RLV	- £12,747,164	- £169,556
Surplus / <b>Deficit</b>	- £23,718,207	- £8,106,056

6.2.15 The DS2 viability assessment assumes a Benchmark Land Value of £10,971,043 based on the existing site comprising an office building (Berol House) arranged over ground to second floors. The building is currently 82% let to multiple tenants with a total passing rent of £438,399 per annum. The assessment also assumes CIL and s106 financial obligations as agreed under HGY/2023/0261 which includes a total CIL liability of £4,734,073.95.

6.2.16 The DS2 viability assessment was independently reviewed by Carter Jonas (see Appendix 7), on behalf of the Local Planning Authority, who questioned several assumptions but agreed the scheme was in deficit. Carter Jonas suggested that the proposal would be in deficit by £8,106,056 rather than the applicant's claim of £23,718,207.

6.2.17 The GLA's Viability Team also reviewed the FVA (see Appendix 8). They found that the scheme would produce a residual land value of between £8,198,450 and £10,404,405. When compared to their Benchmark Land Value of £7,117,639 (based on Existing Use Value plus a premium to incentivise a sale (EUV+)), they considered the scheme to be viable with a surplus at £1,080,811 to £3,286,766.

6.2.18 DS2 then produced a response on behalf of the applicant (see Appendix 9) to the reviews of both Carter Jonas and the GLA. In this response, the applicant accepted several of the positions taken by Carter Jonas and the GLA and reduced the deficit from £23,718,207 to £15,000,947. This was a result of reducing the BLV through an amendment to the yields, reducing the operating cost and expenditure (OPEX) from 25% to 22.5%, and by reducing the construction cost budget.

6.2.19 Carter Jonas produced a rebuttal response (see Appendix 10) which accepted some of the applicant's positions and concluded that the proposal would now be in deficit by £11,195,531. See Table 3 below:

*Table 3 – Updated viability deficit*

Proposed development	DS2 (Applicant)	Carter Jonas ( LPA)
Total BLV	£8,658,000	£8,658,000
RLV	- £6,342,947	- £2,537,531

Proposed development	DS2 (Applicant)	Carter Jonas ( LPA)
Surplus / <b>Deficit</b>	- £15,000,947	- £11,195,531

6.2.20 The GLA's Viability Team then produced their own rebuttal response (see Appendix 11). This rebuttal concluded that the viability position of the proposed development when assessed on a current day basis, with no affordable housing, would result in a deficit of £6,449,377.

6.2.21 However, the GLA based this on a 3% allowance for purchaser's costs as they asserted that the applicant would utilise a Special Purpose Vehicle to facilitate the BtR transaction, which would achieve tax efficiencies in the form of stamp duty savings.

6.2.22 The Council has accepted 6.8% purchaser's costs on other recent schemes when assessing viability. This is in line with the RICS 2018 Professional Standard 'valuing residential property purpose built for renting' which states that any deductions to purchaser's costs should be representative of the market rather than the specific stamp duty position of the investor.

6.2.23 When 6.8% purchaser's costs are accepted, the GLA's Viability Team deficit of £6,449,377 moves much closer to the Carter Jonas deficit of £11,195,531. Regardless of the differences in the total amounts of deficit, the GLA Viability Team accepts and agrees (see Appendix 11: GLA Viability Team Comments 28 November 2025) that on a current day basis, with no affordable housing, the proposal is unviable and cannot support an affordable housing contribution.

6.2.24 The GLA rebuttal included several sensitivity tests to understand the changes of viability position when growth and inflation are assumed, throughout the development period. Whilst some of these tests produced surpluses, they have not been carried out on a current day basis. With regard to growth, the Council's viability consultant has advised that there have been several appeal decisions confirming that FVAs should be based on current-day costs and values.

6.2.25 While growth can be tested at a high level through sensitivities, particularly where positive market movements may improve viability, that is ultimately the purpose of the review mechanisms to capture any uplift. Instead of review mechanisms being secured, the applicant has offered in lieu of the early, development break, and late-stage viability review mechanisms a total contribution of £1,534,050.00.

6.2.26 The GLA rebuttal also included several sensitivity tests relating to the measures to support housebuilding in London as announced by the Government and Mayor of London in October 2025 and put into the draft London Plan Guidance (Support for housebuilding) in November 2025.

6.2.27 For context, the Government's consultation on the proposed London emergency housing package states that 'Housebuilding in the capital has faced significant challenges over recent years – including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs regulatory blockers and wider economic conditions'.

6.2.28 Testing of the following was carried out:

- 20% Affordable Housing with Grant,
- 20% Affordable Housing with CIL relief, and;
- CIL relief + Grant funding.

Each of these tests above resulted in deficits of circa £10 million.

6.2.29 The GLA rebuttal also asserted that the BtR block, if delivered in isolation, would be more viable and that the applicant may fail to deliver the commercial floorspace without restrictions secured to prevent this.

6.2.30 During the determination of the initial Berol Quarter planning application (HGY/2023/0261) it was acknowledged by Officers that it was not possible or practical to link the delivery of Berol House with 2 Berol Yard.

6.2.31 Berol House is currently an occupied serviced office building, which provides employment space for many local businesses, details of the leases (including remaining term length) was disclosed during the planning process. This demonstrated that Vacant Possession could not be guaranteed within the same timescale as the commencement and construction of 2 Berol Yard.

6.2.32 In recognition of the importance of the existing employment provided at Berol House, the s106 required the applicant to prepare a Relocation Strategy to support the relocation of existing tenants.

6.2.33 Furthermore, the s106 required the applicant to accept a financial penalty in the event that the commencement of Berol House was delayed beyond the earlier of: 30th June 2029, or the practical completion of 2 Berol Yard (and the associated public realm).

6.2.34 It required that Additional Affordable Workspace would need to be delivered in those instances and for it to be let at 80% of the market rent until the later of: three years from the date of Practical Completion of 2 Berol Yard; or the date of Practical Completion of Berol House.

6.2.35 This penalty would remain and would encourage the applicant to deliver Berol House when they can achieve vacant possession and begin to implement the proposals for that building/phase.

6.2.36 The GLA rebuttal concludes:

*“Based on our assessment of the scheme on a current day basis, the proposed development would not be viable, even without any affordable housing contributions.”*

*“Therefore, decision-makers should consider the updated viability position, as well as the sensitivity testing carried out in this report, when determining the planning application and afford weight to the submitted viability information. Based on the assessment above, it appears that the scheme would only be viable when reasonable growth and inflation are applied.”*

6.2.37 Subsequent to the November 2025 GLA rebuttal the applicant met with the GLA viability team and Haringey Officers on 6 January 2026 to discuss areas of difference. The applicant then submitted a letter from DS2 summarising the discussion and setting out their position (See Appendix 14).

6.2.38 The GLA responded on 27 January 2026 (See Appendix 15) to confirm that the updated appraisal shows that the proposed development, when assessed on a current day basis with no affordable housing, a negative RLV of £3,485,238 is generated against a BLV of £8,658,000 meaning that a deficit of £12,053,238.80 remains as part of the application demonstrating that the proposal with nil affordable housing is not financially viable.

6.2.39 This latest GLA response states that the scheme should incorporate early and late stage review mechanisms as per Policy H5 of the London Plan. However, the applicant has offered to make a Payment in Lieu (PiL) to the Council to provide affordable housing in the sum of £1,534,050.00 (£7,305 per unit) to compensate for the removal of the Review Mechanisms.

6.2.40 This is accepted as it gives more certainty to the Council and applicant and the contribution can be put towards Haringey’s Council house building programme. In order to encourage delivery of 2 Berol Yard and to help ensure the public benefits of the scheme are delivered, the applicant would be penalised if 2 Berol Yard is not completed within 50 months of commencement.

6.2.41 The applicant would be required to pay Additional Affordable Housing Payments of £153,405 per year for each year completion of 2 Berol Yard is delayed by, beyond 50 months from commencement. The 50 month timeframe allows for potential delays with the gateways to building safety and any minor adjustments that may be required to the scheme to respond to the latest Fire Regulations, which is why the trigger is linked to commencement of 2 Berol Yard and not a planning permission date.

6.2.42 The GLA also refer to the recent government announcement, through a Written Ministerial Statement and letter to the planning inspectorate, which seeks to

address the use of s73 to stop it being used as an alternative means of reconsidering fundamental questions of scheme viability or planning obligations.

6.2.43 As part of this, the government have set out that where s73 is being used to reduce affordable housing that the decision maker should have regard to the harm that such a reduction may cause and give this appropriate weight in the overall planning balance.

6.2.44 The GLA have concluded that the proposal cannot support an affordable housing contribution. The loss of the affordable housing has been given appropriate weight in this assessment. It should be noted that although the site would not provide affordable homes it would provide a substantial number of homes as well as other benefits which formed part of the extant consent as set out below in the conclusion.

### 6.3. **Other matters**

#### Biodiversity Net Gain (BNG)

6.3.1 Planning application HGY/2023/0261 was submitted prior to day one of the mandatory BNG requirements coming into force on 12 February 2024. The need to include biodiversity net gain measures into the scheme does not apply to s73 permissions where the application for the original permission was made before 12 February 2024; as in this case.

6.3.2 However, the site has little existing biodiversity value and the proposals include new tree planting and landscaping that would deliver biodiversity net gain and urban greening benefits.

#### DEN connection costs

6.3.3 Within the viability appraisal, provision has been made for the District Energy Network (DEN) connection at a cost of £1,900,000.00 reflecting the figure mentioned during the original s106 negotiations. This sum is materially higher than the £50,000 DEN contributions secured under the Berol Yard permission (HGY/2017/2044) and the Ashley Gardens scheme (HGY/2017/2045).

6.3.4 Accordingly, the applicant has proposed that the DEN connection cost is similarly capped within the Section 106 at £61,740, reflecting the previously agreed position with an allowance for inflation. The capping of this charge allows for, in parallel, a financial contribution to be made in lieu of the early, mid and late-stage viability reviews calculated at £7,305 per unit, equating to a total contribution of £1,534,050.

#### Key Worker Living Rent (KWLR) homes

- 6.3.5 On 20 January 2026 the Mayor of London launched a new plan to deliver thousands of rent-controlled, affordable homes for London's key workers. The scheme is specifically aimed at Londoners working in key worker roles, including those at the start of their careers, who are unlikely to secure social rented homes but who struggle to afford a home that meets their needs in the private market.
- 6.3.6 The proposal would not be able to include such homes given the viability position which cannot support any on-site affordable housing. From the information currently available, grant funding for this type of intermediate affordable housing would be similar to current levels for LLR homes. As the scheme cannot viably support LLR it is expected that this would also be the case for KWLR homes.

#### Council purchase of homes

- 6.3.7 The potential purchase of part or all of the development has been considered. London Plan Policy H11 (Build to Rent) does not encourage dual ownership with a Registered Provider or a Council managing/operating some of the units. The policy provides a specific approach to the affordable housing offer, where the aim is to maintain the integrity of the Build to Rent development, with unified ownership and management of all the homes.
- 6.3.8 Split ownership of the building is unlikely to meet the Council's needs and result in management issues. The cost of purchasing all of the housing would be too high even if a deal was possible and there would be too many units that would need to be purchased. Should things change in the future, Housing colleagues could look at it again, but sale of the homes is not something that the applicant has proposed.

#### **6.4. Conclusion**

- 6.4.1 In conclusion, whilst current market conditions mean that the scheme can no longer deliver any on-site affordable housing the scheme would still deliver a number of substantial public benefits, as follows:
- A high quality designed housing and commercial development with 210 market homes and over 6,000sqm of commercial floorspace
  - A high quality landmark tall building that was supported by the Quality Review Panel (QRP)
  - A Payment in Lieu (PiL) of £1,534,050.00 (£7,305 per unit) towards affordable housing in the borough.
  - Additional Affordable Housing Payments of £153,405 per year for each year completion of 2 Berol Yard is delayed by, beyond 50 months from commencement.
  - Significant new employment opportunities during construction and once completed
  - Submission of a Commercial Strategy identifying how the proposed uses would complement and enhance the commercial offer in Tottenham Hale

- Employment and skills obligations including: 20% of the workforce employed during construction to comprise Haringey residents, the provision of skills-based training for 25% of those employed, employment of full-time apprenticeships up to 10% of workforce, and contribution to apprenticeship support
- A new 161sqm community cultural and arts space to be let rent free for 3 years and subsequently at 80% of market rate for an agreed period up to 15 years
- A new bridge head to support the delivery of a potential future bridge over Watermead Way and the railway into Hale Village
- Submission of a feasibility study for the bridge over Watermead Way and the railway, including design options and secure by design principles in consultation with the Metropolitan Police
- A new public square and outdoor arts space to display local artworks and sculptures, which will be enhanced by a public lighting display
- Public realm improvements to further enhance the new District Centre and Ashley Road South including new tree planting and landscaping contributing to an increase in urban greening and biodiversity
- Estimated carbon offset of £327,750.00 for the whole development (to be reviewed once the amended energy statement has been assessed)
- Berol House Relocation Strategy - Submission of a relocation strategy to identify how existing occupants within Berol House would be supported to find new suitable premises
- £25,000 National Health Service (NHS) Contribution
- S106 obligations and Mayoral and Local CIL (in excess of £4.7 million - £1,905,709.63 Mayoral CIL and £2,828,364.32 Haringey CIL) to contribute towards infrastructure improvements within the Borough and London as a whole (the full total of which would need to be paid as the scheme would no longer benefit from any form of relief)

6.4.2 These are significant public benefits and therefore it is recommended, on balance, that the proposal is granted, subject to conditions and a deed of variation, and subject to any contrary direction from the Mayor at Stage 2.

6.4.3 All relevant policies and considerations, including equalities, have been considered when making the recommendation. Section 149 of the Equality Act 2010 created the public sector equality duty. Section 149 states:

A public authority must, in the exercise of its functions, have due regard to the need to:

- a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

6.4.4 Officers have taken this into account and given due regard to this statutory duty, and the matters specified in Section 149 of the Equality Act 2010, when making a recommendation on this application. There are no known equality implications arising directly from this development.

## **7. COMMUNITY INFRASTRUCTURE LEVY (CIL)**

7.1. Based on the information submitted, the Mayoral CIL charge will be approximately £1,905,709.63 (26,807sqm x £71.09). The Haringey CIL charge will be approximately £2,828,364.32 (24,016sqm x £117.77). The total CIL liability would be £4,734,073.95.

7.2. It is noted that under permission HGY/2023/0261 the applicant would have benefitted from social housing relief because of the inclusion of affordable homes.

7.3. Because the affordable housing has been removed, the applicant will no longer benefit from relief and therefore has to pay the full liability, this would result in an increased payment of over half a million pounds (£572,132.32) more towards Mayoral CIL and over £600k (619,116.89) more towards Haringey CIL and infrastructure within the Borough.

7.4. It is noted that in the east of the Borough, the Build to Rent CIL charge (£120.48/sqm) is double that of the standard private residential CIL Charge (£60.24/sqm). So therefore, this development would be contributing £1,414,182.16 more to infrastructure in Haringey than a conventional residential development would be contributing.

7.5. This will be collected by Haringey should the scheme be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment. An informative is recommended advising the applicant of this charge.

## **8. RECOMMENDATION**

8.1. It is recommended Planning Permission is granted subject to conditions, informatives and the signing of a Deed of Variation legal agreement, and subject to referral to the Mayor of London and any direction they make, as set out in Section 2.

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## Appendix 1 – Planning Conditions & Informatives

### 1. Time Limit (Compliance)

The development shall be begun within **three** years of the date of expiry of planning permission HGY/2023/0261 (03/03/2028).

REASON: This condition is imposed by virtue of Section 91 of the Town & Country Planning Act 1990 and to prevent the accumulation of unimplemented planning permissions.

### 2. Approved Plans and Documents (Compliance)

The Development hereby approved shall be carried out in accordance with the following approved plans and documents except where conditions attached to this planning permission indicate otherwise or where alternative details have been subsequently approved following an application for a non-material amendment:

#### Proposed drawings:

22049\_07\_100 Ground Floor Plan 1:250 A1 P01  
 22049\_07\_100\_M Mezzanine Floor Plan 1:250 A1 P01  
 22049\_07\_101 First Floor Plan 1:250 A1 P01  
 22049\_07\_102 Typical Floor Plan - Level 02-05 1:250 A1 P01  
 22049\_07\_106 Typical Floor Plan - Level 06-16 1:250 A1 P01  
 22049\_07\_117 Typical Floor Plan - Level 17 1:250 A1 P01  
 22049\_07\_118 Typical Floor Plan - Level 18 1:250 A1 P01  
 22049\_07\_119 Typical Floor Plan - Level 19-24 1:250 A1 P01  
 22049\_07\_125 Typical Floor Plan - Level 25-27 1:250 A1 P01  
 22049\_07\_128 Typical Floor Plan - Level 28-29 1:250 A1 P01  
 22049\_06\_130 Typical Roof Plan - Level 30 1:250 A1 P01  
 22049\_07\_131 Typical Roof Plan - Roof 1:250 A1 P01  
 22049\_07\_200 South Elevation - Ashley Link 1:250 A1 P01  
 22049\_07\_201 West Elevation - Berol Walk 1:250 A1 P01  
 22049\_07\_202 North Elevation - Gessner Lane 1:250 A1 P02  
 22049\_07\_203 East Elevation - Watermead Way 1:250 A1 P02  
 22049\_06\_300 Section A-A 1:250 A1 P01  
 22049\_07\_301 Section B-B 1:250 A1 P01  
 22049\_07\_302 Section C-C 1:250 A1 P02  
 22049\_07\_303 Section D-D 1:250 A1 P01  
 22049\_07\_400 Bay Study - Typical Bay Bar B 1:50 A1 P01  
 22049\_07\_401 Bay Study - Gable Bay Bar D 1:50 A1 P02  
 22049\_07\_402 Bay Study - Bar A Gable 1:50 A1 P01  
 22049\_07\_403 Bay Study - Bar E 1:50 A1 P01  
 22049\_07\_404 Bay Study - Bar E 1:50 A1 P01  
 22049\_07\_405 Bay Study - Typical Bay Bar A 1:50 A1 P01  
 2042-JMP-XX-00-DR-A-D1000 Demolition Level 00 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1001 Demolition Level 01 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1002 Demolition Level 02 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1003 Demolition Level 03 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1004 Demolition Level 04 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D4000 Demolition Elevations 1:200 A1 01

2042-JMP-XX-00-DR-A-3000 Proposed Level 00 1:200 A1 01  
2042-JMP-XX-00-DR-A-3001 Proposed Level 01 1:200 A1 01  
2042-JMP-XX-00-DR-A-3002 Proposed Level 02 1:200 A1 01  
2042-JMP-XX-00-DR-A-3003 Proposed Level 03 1:200 A1 01  
2042-JMP-XX-00-DR-A-3004 Proposed Level 04 1:200 A1 01  
2042-JMP-XX-00-DR-A-3005 Proposed Level 05 1:200 A1 01  
2042-JMP-XX-00-DR-A-3006 Proposed Level 06 1:200 A1 01  
2042-JMP-XX-00-DR-A-4000 Proposed Elevations 1:200 A1 01  
2042-JMP-XX-00-DR-A-5000 Proposed Sections 1:200 A1 01  
2042-JMP-XX-XX-SH-A-SH001 Proposed Project Areas 1:200 A1 01

Other documents:

Berol Quarter Design and Access Statement (dated December 2022)  
WLC Assessment Report (dated 25/05/2023)  
Detailed Circular Economy Statement (dated 25/05/2023)

REASON: In order to ensure that the development is carried out in accordance with the approved details.

**3. Phasing Plan (PRE-COMMENCEMENT)**

No part of the Development shall be carried out unless and until a phasing plan showing the location of each Phase and including details of the order in which the Development Phases will be commenced has been submitted to and approved in writing by the Local Planning Authority.

The development shall then be carried out in accordance with the approved details.

REASON: To assist with the identification of each chargeable development (being each Phase) and the calculation of the amount of CIL payable in accordance with the Community Infrastructure Levy Regulations 2010 (as amended) and to ensure that housing and other uses are delivered in a co-ordinated way.

**4. Accessible Accommodation (Part compliance, part pre-occupation)**

(a) The buildings hereby permitted shall be constructed so that they can be entered and used safely, easily and with dignity by all; are convenient and welcoming (with no disabling barriers); and provide independent access without additional undue effort, separation, or special treatment, and meet the requirements of paragraph 3.5.3 of London Plan 2021 Policy D5.

(b) 90% of the homes shall be in accordance with Part M(2) of Approved Document M of the Building Regulations and 10% shall be in accordance with Part M4(3) as wheelchair adaptable homes.

(c) A plan shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of 2 Berol Yard showing the proportional distribution of M4(3) wheelchair adaptable homes across the tenures. The distribution shall thereafter be retained unless otherwise agreed in writing.

REASON: To ensure that the proposed development meets the Council's standards for the provision of wheelchair accessible dwellings and to be in accordance with Policy D7 of the London Plan 2021 and Policy SP2 of the Local Plan 2017.

#### **5. Commercial Units - Opening Hours (Compliance)**

(a) The commercial uses (Use Class E) shall only be open to the public between the hours of 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays) unless otherwise agreed in writing in advance by the Local Planning Authority.

REASON: To safeguard residential amenity and in order to comply with Policy DM1 and Policy DM38 of the Development Management Development Plan Document 2017 and Policy D14 of the London Plan 2021.

#### **6. Commercial Units - Class E Only (Compliance)**

Notwithstanding the provisions of the Town & Country Planning (Use Classes) Order 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the commercial units hereby approved shall be used for activities within Use Class E, in accordance with the details hereby approved, only and shall not be used for any other purpose unless where suitable alternative details have been subsequently approved by the Local Planning Authority following an application for a non-material amendment.

REASON: In order to restrict the use of the premises to those compatible with the surrounding area and in order to comply with Policy DM1 and Policy DM38 of the Development Management Development Plan Document 2017.

#### **7. Quantum of development (Compliance)**

The development hereby permitted shall comply with the following amounts unless otherwise permitted in writing by the Local Planning Authority:

<b>Building</b>	<b>Maximum non-residential floorspace (GIA)</b>	<b>Residential units</b>
2 Berol Yard	867	210
Berol House	5492	0
<b>Total</b>	<b>6,359</b>	<b>210</b>

REASON: To ensure that the development is undertaken in accordance with the approved drawings and documents, to protect local amenity and to be in accordance with Policy DM1 and Policy DM38 of the Development Management Development Plan Document 2017.

#### **8. BREEAM Certificates (PRE-COMMENCEMENT)**

(a) Prior to commencement on site, a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority

confirming that the development will achieve a BREEAM 'Very Good' outcome (or equivalent), aiming for 'Excellent'. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.

The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.

(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

REASON: In the interest of addressing climate change and securing sustainable development and to be in accordance with Policies SI2, SI3 and SI4, of the London Plan 2021 Policy SP4 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

#### **9. Residential – Noise Attenuation (Compliance)**

The residential element of the development shall be completed in accordance with the approved Acoustic Report Development and in accordance with the Noise and Vibration Assessment prepared by WSP (dated December 2022) and the limits contained therein, as set out below, unless otherwise approved in writing by the local planning authority.

- A) (i) The residential units hereby authorised shall be designed so as to provide sound insulation against external noise and vibration, to achieve levels not exceeding 30dB LAeq (night) and 45dB LAmax for bedrooms, 35dB LAeq (day) for other habitable rooms, with windows shut and other means of ventilation provided.  
(ii) The evaluation of human exposure to vibration within the buildings shall not exceed the vibration dose values criteria 'Low probability of adverse comment' as defined by BS6472.
- B) No development of the residential element of the development shall commence until details of a sound and vibration insulation scheme for that building complying with part (a) (i), and (ii) of this condition and a Mechanical Ventilation and Heat Recovery (MVHR) system for that building (capable of overcoming thermal overheating as defined in Approved document Part L1A) has been submitted to and approved in writing by the Local Planning Authority.

- C) The residential units shall not be occupied until the sound and vibration insulation scheme and MVHR system approved pursuant to part (b) of this condition for that building has been implemented in its entirety. Thereafter, the sound and vibration insulation scheme shall be permanently maintained in accordance with the approved details unless otherwise agreed in writing.

REASON: In order to ensure a satisfactory internal noise environment for occupiers of the accommodation and to protect residential amenity and to be in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

**10. Residential – Noise Attenuation from commercial (Pre-occupation)**

- A) No occupation of the commercial/community units shall commence until such times as full details of the floor slab/walls and any other noise attenuation measures between the ground/first floor or commercial unit and homes on next to/ on adjacent floors has been submitted to and approved in writing by the Local Planning Authority.
- B) The details shall be designed to ensure that at any junction between the accommodation and the commercial/community units shall achieve a noise insulation level for of no less than 55 dB DnT,w + Ctr.
- C) The approved floor slab and any other noise attenuation measures shall be completed prior to the occupation of the commercial units and shall be maintained thereafter.

REASON: In order to ensure a satisfactory internal noise environment for occupiers of the accommodation and to be in accordance with Policy DM1 of the Development Management Development Plan Document 2017

**11. Fire Statement (Pre-superstructure)**

PART A Prior to commencement of the above ground works for each Phase of the development hereby approved, a construction phase fire strategy shall be submitted to and approved by the Local Planning Authority, to include:

- details of access for firefighting personnel and equipment;
- that there is sufficient firefighting water supply; and
- details of the evacuation strategy and assembly points in the event of a fire, should be provided to and approved by the Local Planning Authority. Once approved the development shall be completed in accordance with the approved details.

PART B Prior to the first occupation of each Phase the development hereby approved, an updated Fire Strategy Statement (FSS) shall be submitted to and approved by the Local Planning Authority:

- where fire and rescue service pumping appliances are to be sited;
- the location of fire evacuation assembly points and mitigation measures to ensure they are kept clear of obstructions; evacuation strategy including

provisions for the evacuation of mobility impaired residents and details of how the strategy would be communicated to residents;

- adequate firefighting water supply;
- how the FSS would be managed, updated, and monitored as required;
- how residents will be notified of the strategy,

Once approved the development shall be completed in accordance with the approved details and retained as such thereafter where relevant.

REASON: To ensure that the development incorporates the necessary fire safety measures in accordance with Policies D5 and D12 of the London Plan 2021.

### **12. Landscape Details (Pre-occupation)**

(a) Prior to the first occupation of each Phase of the development hereby approved full details of both hard and soft landscape proposals (excluding the private amenity areas) shall be submitted to and approved by the Local Planning Authority. These details shall accord with proposals contained in the approved drawings and shall include, as appropriate:

- i) Hard surfacing materials (The paving within the publicly accessed areas of the site must match that which has been adopted around the rest of the Tottenham Hale public realm unless otherwise agreed in writing);
- ii) Proposed finished levels or contours
- iii) Means of enclosure
- iv) Car parking layouts
- v) Other vehicle and pedestrian access and circulation areas
- vi) Hard surfacing materials
- vii) Minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting)
- viii) Proposed and existing functional services above and below ground (e.g. drainage, power, communication cables, pipelines, etc, indicating lines, manholes, supports etc).
- ix) Any relevant drainage/SuDS features.
- x) Minor artefacts/structures (e.g. furniture, refuse or other storage units, signs etc.);
- xi) Planting plans and a full schedule of species of new trees and shrubs proposed to be planted noting species, plant sizes and proposed numbers/densities where appropriate;
- xii) Written specifications (including cultivation and other operations) associated with plant and grass establishment; and
- xiii) Implementation programme.

The approved scheme shall then be completed before first occupation of each Phase of the development and be permanently maintained thereafter.

(b) The soft and hard landscaping plan must include all elements present in the wind microclimate studies and show how the proposals would ensure a safe and comfortable wind microclimate.

(c) Any trees or shrubs which die, are removed, or become seriously damaged or diseased within five years from the completion of the landscaping works shall be replaced in the next planting season with the same species or an approved alternative as agreed in writing by the Local Planning Authority.

REASON: In order for the Local Planning Authority to assess the acceptability of the landscaping scheme, thereby ensuring a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy DM1 of the Development Management Development Plan Document 2017 and Policy SP11 of the Local Plan 2017.

### **13. Playspace** (Pre-occupation)

Prior to occupation of the residential units, details of the children's playspace and soft landscaping provision contained within the private amenity areas of 2 Berol Yard, in accordance with the approved drawings, shall be submitted to and approved in writing by the Local Planning Authority.

The details shall include:

- a. location, layout, design of any playspace; and
- b. equipment/ features
- c. hard surfacing materials
- d. minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting)
- e. proposed and existing functional services above and below ground (e.g. drainage, power, communication cables, pipelines, etc, indicating lines, manholes, supports etc)

Soft landscape details shall include:

- a. Planting plans
- b. Written specifications (including cultivation and other operations associated with plant and grass establishment)
- c. Schedules of plants, noting species, planting sizes and proposed numbers / densities where appropriate
- d. Implementation timetables.

The landscaping, playspace and equipment/features shall be laid out and installed prior to the first occupation of the development. The amenity space shall be provided strictly in accordance with the details so approved, installed/erected prior to the first occupation of the residential dwellings and shall be maintained as such thereafter.

REASON: To secure the appropriate provision and design of children's playspace, and to meet the playspace requirements of Policy S4 of the London Plan 2021.

### **14. Surface Water Drainage** (Pre-occupation)

A detailed Surface Water Drainage scheme, and a management and maintenance plan for the site shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development. The detailed drainage scheme shall demonstrate the following:

- a) Hydraulic calculations using XP Solutions Micro-Drainage software or similar as agreed in writing with the LPA. All elements of the drainage system should be included in the model, with an explanation provided for any assumptions made in the modelling. The model results shall be provided for critical storm durations of each element of the system and should demonstrate that all the criteria above are met and that there is no surcharging of the system for the 1 in 2-year rainfall, no flooding of the surface of the site for the 3.3% (1in30) rainfall and flooding only in safe areas for the 1% (1in100) plus climate change.
- b) For the calculations above, more up to date FEH rainfall datasets must be utilised rather than usage of the FSR rainfall method.
- c) Any overland flows as generated by the scheme must be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on a plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development must be provided.
- d) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter maintained effectively and retained for the lifetime of the development unless otherwise agreed in writing.

The detailed management and maintenance plan shall include the following:

- e) arrangements for adoption by an appropriate public body or statutory undertaker, management by a resident management company or other suitable arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be applied in accordance with the approved details and thereafter retained for the lifetime of the development.

REASON: To ensure that the principles of sustainable drainage are incorporated into the proposal and maintained thereafter in order to comply with Policies SI12, and SI13 of the London Plan 2021, Policy SP5 of the Local Plan 2017 and Policy DM24 of the Development Management Development Plan Document 2017.

#### **15. Surface water network (Thames Water) (Pre-occupation)**

The development shall not be occupied until confirmation has been provided that either:

- a) All surface water network upgrades required to accommodate the additional flows from the development have been completed; or-
- b) A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

REASON: Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents and in order to comply with Policy DM29 of the Development Management Development Plan Document 2017.

**16. Water network capacity (Thames Water) (Pre-occupation)**

The development shall not be occupied until confirmation has been provided that either:

1. all water network upgrades required to accommodate the additional demand to serve the development have been completed; or –
2. a development and infrastructure phasing plan has been agreed with Thames Water to allow the development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development and in order to comply with Policy DM29 of the Development Management Development Plan Document 2017.

**17. Flood Warning and Evacuation Plan (FWEP) (Pre-occupation)**

A Flood Warning and Evacuation Plan (FWEP) for the site shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development. The FWEP shall include consideration of the identified risk of reservoir flooding.

The approved FWEP shall be put into practice and retained thereafter unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure any risk to life minimised, damage is mitigated, and a safe and orderly evacuation of site users during a flood is enabled in order to comply with Policies SI12, and SI13 of the London Plan 2021, Policy SP5 of the Local Plan 2017 and Policy DM24 of the Development Management Development Plan Document 2017.

**18. Water Efficiency Condition (Compliance)**

The dwelling(s) shall be constructed to meet, as a minimum, the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day using the fittings approach.

REASON: The site is in an area of serious water stress requiring water efficiency opportunities to be maximised; to mitigate the impacts of climate change; in the interests of sustainability; and to use natural resources prudently in accordance with the NPPF 2024.

**19. Biodiversity** (Pre-occupation)

(a) Prior to occupation of the development, details of ecological enhancement measures shall be submitted to and approved in writing by the Council. This shall include: details (including quantitative evidence) that confirms the proposed development would secure a net biodiversity gain in accordance with Policy G6(D); plans showing the proposed location of ecological enhancement measures (which could include, for example, bat boxes, bird boxes and bee bricks); a sensitive lighting scheme; justification for the location and type of enhancement measures by a qualified ecologist; and how the development will support and protect local wildlife and natural habitats.

The measures shall show how additional greening has been maximised wherever possible through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls shall be maximised.

(b) Within 3 months of the occupation of the development, photographic evidence and a post-development ecological field survey and assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.

(c) The development shall accord with the details as approved and the measures shall be retained for the lifetime of the development unless otherwise agreed in writing.

REASON: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change and to be in accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan 2021 and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

**20. Lighting** (Pre-occupation)

Prior to first occupation of each Phase of the development hereby approved, details of all external lighting to approved building facades, street furniture, communal and public realm areas shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Council's Senior Lighting Engineer and Nature Conservation Officer. Such details shall include location, height, type and direction of sources and intensity of illumination, demonstrated through a lux plan. Due regard shall be had to the recommendations of the approved Ecological Impact Assessment. The agreed lighting scheme shall be installed as approved and retained/maintained as such thereafter.

REASON: To ensure the design, ecological and environmental quality of the development is protected and enhanced and also to safeguard residential amenity and to be in accordance with Policies DM1, DM19 and DM23 of the Development Management Development Plan Document 2017.

### **21. External Materials and Details (Pre-superstructure)**

Before the relevant part of the work has commenced on each Phase of the development, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority:

- a) Detailed elevational treatment;
- b) Detailing of roof and parapet treatment;
- c) Windows and doors (including plan, elevation and section drawings indicating jamb, head, cill, reveal and surrounds of all external windows and doors at a scale of 1:10);
- d) Details of entrances and porches (at a scale of 1:10);
- e) Details and locations of down pipes, rainwater pipes or foul pipes and all external vents;
- f) Details of balustrading;
- g) Facing brickwork, external facing materials, cladding materials and finishes and glazing: sample panels of proposed materials to be used showing the colour, texture, pointing, bond, mortar, and brickwork detailing shall be provided;
- h) Details of cycle, refuse enclosures and plant room; and
- i) Any other external materials to be used;
- j) Plans of ground floor entrance cores and entrance-door thresholds at 1:20 and elevations of entrance doors at 1:20;
- k) Sectional and elevational drawings at 1:20 of junctions between different external materials, balconies, parapets to roofs, roof terraces and roofs of cores;
- l) a full schedule of the exact product references for all materials.

The development shall thereafter be carried out solely in accordance with the approved details.

REASON: To safeguard and enhance the visual amenities of the locality and to be in accordance with Policies DM1, DM8 and DM9 of the Development Management Development Plan Document 2017.

### **22. Living roofs (Pre-superstructure)**

- A. Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include the following unless otherwise agreed in writing:
  - i) A roof plan identifying where the living roofs will be located;
  - ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);
  - iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate

- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with root ball of plugs 25cm<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and
- vii) Management and maintenance plan, including frequency of watering arrangements.
- viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;

B. Prior to the occupation of 90% of the development, evidence shall be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

REASON: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall and to be in accordance with Policies G1, G5, G6, S11 and S12 of the London Plan 2021 and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

### **23. Landscape and ecological management plan (LEMP) (Pre-occupation)**

Prior to occupation of the development a landscape and ecological management plan (LEMP) shall be submitted to and approved in writing by the Council. The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed
- b) Ecological trends and constraints on site that might influence management
- c) Aims and objectives of management
- d) Appropriate management options for achieving aims and objectives
- e) Prescriptions for management actions
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period)
- g) Details of the who shall be responsible for implementation of the plan
- h) Ongoing monitoring and remedial measures

The LEMP shall also include details of the legal and funding mechanism(s) by which long term implementation of the plan will be secured by the developer. The plan shall

also set out (where results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed, and implemented so that the development still delivers the fully functioning biodiversity objectives of the approved scheme. The approved plan shall be implemented in accordance with the approved details.

REASON: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with Policies G1, G5, G6, SI1 and SI2 of the London Plan 2021 and Policies SP4, SP5, SP11 and SP13 of the Local Plan 2017.

#### **24. Energy Strategy (Pre-superstructure)**

The development hereby approved shall be constructed in accordance with the Energy Statement prepared by WSP (dated 13th June 2023) delivering a minimum 72% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network, and a minimum 31kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved in writing by the Local Planning Authority. This must include:

- Carbon reduction following the energy hierarchy for future connection to the DEN;
- The applicant needs to achieve the following: (1) A combined DLF (for the offsite and onsite network) of 1.25, (2) this should assume the offsite DLF is 1.05 (and so the onsite network will have a DLF of  $1.25/1.05=1.19$ ; and (3) to certify that the combined DLF through the PCDB.
- Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;
- Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction with SAP10 carbon factors;
- Details on what measures will be undertaken to make the retained locally listed building more energy efficient (what type of insulation, how the building will be made more airtight, etc).
- Details to reduce thermal bridging;
- Calculated Primary Energy Factor, Energy Use Intensity and space heating demand and its performance against GLA benchmarks for a similar use;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions; and
- A metering strategy.

- The amount of and calculation for the Carbon Offsetting Contribution (if applicable) assuming connection to the DEN for each of the buildings comprised in the relevant Phase anticipated from the data in the submitted Energy Plan.

The development shall be carried out strictly in accordance with the details so approved prior to first occupation and shall be maintained and retained for the lifetime of the development unless otherwise agreed in writing. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(b) The solar PV arrays must be installed and brought into use prior to first occupation of the relevant building. Six months following the first occupation of that building, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.

(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform and monitoring results shall be submitted to the GLA for at least 5 years post-occupation (in accordance with the Mayor of London's Be Seen Energy Monitoring guidance)

REASON: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and to be in accordance with Policy SI2 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM22 of the Development Management Development Plan Document 2017.

### **25. DEN Connection (Pre-superstructure)**

Prior to the above ground commencement of construction work, details relating to the future connection to the DEN shall be submitted to and approved by the local planning authority. This shall include:

- Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.
- Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;
- A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized

to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;

- Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;
- Details of the route for connecting the non-residential Berol House with the energy centre in 2 Berol Yard;
- Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;
- Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;
- Details of a future pipework route from the temporary boiler location to the plant room.

REASON: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and to be in accordance with Policy SI2 and SI3 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and Policy DM22 of the Development Management Development Plan Document 2017.

## **26. Overheating (Pre-superstructure)**

(a) Prior to the above ground commencement of the development, revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan for both new build and refurbished part of the development. This assessment shall be based on the TM52 and TM59 Overheating modelling undertaken by WSP (Energy statement dated 13<sup>th</sup> June 2023).

This report shall include:

- Revised modelling of units modelled based on CIBSE TM52/59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of distribution heat losses, external shading, crime, noise, and air quality issues are assessed and mitigated appropriately evidenced by the proposed location and specification of measures;
- Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;

- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.

(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development as approved by or superseded by the latest approved Overheating Strategy.

If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.

REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained and to be in accordance with Policy SI4 of the London Plan 2021, Policy SP4 of the Local Plan and Policy DM21 of the Development Management Development Plan Document.

### **27. Overheating Building User Guide (Pre-occupation)**

Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted to and approved by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.

REASON: In the interest of reducing the impacts of climate change and mitigation of overheating risk and to be in accordance with Policy SI4 of the London Plan 2021, Policy SP4 of the Local Plan and Policy DM21 of the Development Management Development Plan Document.

### **28. Circular Economy (Pre-occupation)**

Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.

The relevant Circular Economy Statement shall be submitted to the GLA at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development].

REASON: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with Policies D3, SI2 and SI7 of the London Plan 2021, Policy SP4 and SP6 of the Local Plan 2017 and Policy DM21 of the Development Management Development Plan Document 2017.

**29. Whole Life Carbon (Pre-occupation)**

Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.

REASON: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with Policy SI2 of the London Plan 2021, Policy SP4 of the Local Plan 2017 and PolicyDM21 of the Development Management Development Plan Document.

**30. Secured by Design (Pre-occupation)**

(a) Prior to the first occupation of the building, or within an alternative timescale as may be agreed in writing with the LPA, a 'Secured by Design' accreditation shall be obtained and thereafter all security features included in the accreditation are to be permanently retained.

(b) Accreditation must be achieved according to current and relevant Secured by Design guidelines at the time of above grade works of the development.

The commercial aspects of the development must achieve the relevant Secured by Design certification at the final fitting stage, prior to the commencement of business and details shall be submitted to and approved, in writing, by the Local Planning Authority.

REASON: To ensure a safe and secure development, in the interest of creating safer, sustainable communities, and to reduce crime; to comply with Policies D1, D2, D3 and D8 of the London Plan 2021 and Policy DM2 of the Development Management Development Plan Document 2017.

**31. Written Scheme(s) of Investigation for Archaeology (PRE-COMMENCEMENT)**

(a) No development, other than demolition and investigative works, until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by Stage 1 then for those parts of the site which have archaeological interest a Stage 2 WSI shall be submitted to and approved in writing by the local planning authority. For land that is included within the Stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed Stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation, and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
- B. Where appropriate, details of a programme for delivering related positive public benefits;
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination, and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the Stage 2 WSI.

REASON: To protect the historic environment and to comply with Policy HC1 of the London Plan 2021 and Policy DM9 of the Development Management Development Plan Document 2017.

### **32. Land Contamination (PRE-COMMENCEMENT)**

No development other than demolition or investigative work shall commence until:

- a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.
- b) Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.
- c) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.
- d) The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.
- e) Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

REASON: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety and to comply with Policy DM23 of the Development Management Development Plan Document 2017.

**33. Unexpected Contamination** (If identified)

(a) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority.

(b) The remediation strategy shall be implemented as approved.

REASON: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 196 of the National Planning Policy Framework and to comply with Policy DM23 of the Development Management Development Plan Document 2017.

**34. Car Parking Management Plan** (Pre-occupation)

Prior to the first occupation of each Phase of the development hereby approved a Car Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan(s) must include the following:

(Part A)

- describe how parking will be allocated and managed on the site (for commercial and residential and for both buildings);
- arrangements for leasing and allocating residential car parking spaces for wheelchair users and others;
- provide details of how blue badge holders using the commercial part of the development can use the parking and how this is going to be managed including details of priority criteria for allocation and access for Dial-a-Ride services;
- details for increasing blue badge parking for the commercial use by converting unused residential blue badge parking spaces, subject to findings of appropriate monitoring.
- confirmation that all car parking spaces shall be leased and not sold with individual property;
- details of the controlled access to the parking area(s), parking enforcement, ramp details (if any), to show structural columns, swept paths, vehicle circulatory movements, visibility splays, all while considering pedestrian safety nearby and within the undercroft parking area;
- demonstration that all car parking spaces are of the correct width and length, with in-between allowance of 6m, following the Manual for Street (MfS) guidance and considering the 'IStructE Design recommendations for multi-storey and underground car parks'-third edition;
- details of the width in-between spaces that enables manoeuvring in / out of parking spaces, include swept path analysis for corner spaces and show the structural columns;

- provide all parking spaces with electric vehicle charging infrastructure. 20% of the spaces shall have 'active' Electric Vehicle Charging Points (EVCP) and the locations of the EVCP points shall be identified, marked prior to occupation and retained & maintained thereafter.

(PART B)

- The details and time scales for the interim and final layout for the car parking.
- The details shall identify the arrangements for bringing the additional retail space into use and show how it would be implemented to accord with all relevant conditions.

(PART C)

- The car parking provision and facilities shall be implemented in accordance with the approved details and retained thereafter for this use only unless otherwise agreed in writing.

REASON: To ensure the development is in accordance with Chapter 5 Transport & Parking of the Development Management Development Plan Document 2017, Policies T6.1 and T6.5 of the London Plan 2021 and the Department for Transport's Inclusive Mobility guidance.

**35. Cycle Parking (Pre-superstructure)**

Prior to above ground construction of the relevant Phase of the development hereby permitted, scaled drawings with details of the location and dimensions of secure and covered cycle parking facilities (to include 48 long-stay and 30 short-stay cycle parking spaces for Berol House and 380 long-stay plus 24 short-stay spaces for 2 Berol Yard) shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking details shall demonstrate compliance with the relevant standards in Policy T5 of the London Plan (2021) and the London Cycling Design Standards.

The approved secure and covered cycle parking facilities shall be installed in accordance with the approved details and retained thereafter for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To promote travel by sustainable modes of transport and to be in accordance with the London Plan 2021 minimum cycle parking standards and the London Cycling Design Standards.

**36. Delivery and Servicing Management Plan (Pre-occupation)**

Each Phase of the approved development shall not be occupied until a Delivery and Servicing Plan (DSP) has been submitted to and approved in writing by the Local Planning Authority relevant to the Phase being occupied. The DSP shall be updated in writing and re-submitted to the Local Planning Authority within the first 12 months of occupation or at 75% occupancy, whichever comes first. The development shall thereafter be implemented in accordance with the approved details and retained as such thereafter.

REASON: To enable safe, clean and efficient deliveries and servicing and to be in accordance with Policy DM21 of the Development Management DPD 2017.

**37. Site Waste Management Plan (PRE-COMMENCEMENT)**

No development shall commence until a Site Waste Management Plan (SWMP) has been submitted to and approved in writing by the Local Planning Authority.

The Site Waste Management Plan shall identify how waste would be managed throughout the life cycle of the Berol Quarter project, by addressing the waste hierarchy, waste types, waste storage and handling, waste awareness and waste monitoring and measurement. The plan shall identify how waste would be reduced and managed/re-used during demolition and construction.

The approved Site Waste Management Plan shall be implemented prior to commencement of works and the development shall be operated in accordance with the approved Plan thereafter, unless a review of arrangements and a revised Plan is approved in writing by the Local Planning Authority, in which case the development shall be operated in accordance with any revised Plan that is approved in writing by the Local Planning Authority.

REASON: To ensure that the demolition and construction of the development minimises its environmental impacts, in terms of waste generation and waste management, in accordance with Policy SI 7 of the London Plan 2021.

**38. Waste Management Plan (Pre-occupation)**

A Waste Management Plan for each building shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of that building.

The approved waste plans shall reflect the Operational Waste Plan & Management Strategy dated December 2022 but shall be updated to identify current arrangements.

The approved Waste Management Plans shall be implemented upon first occupation of the buildings and waste operations shall be conducted in accordance with the approved Plans thereafter, unless a review of arrangements and a revised Plan is requested in writing by the Local Planning Authority, in which case the development shall be operated in accordance with any revised Plan that is approved in writing by the Local Planning Authority.

REASON: To ensure suitable provision for the occupiers of the development and to encourage the sustainable management of waste and in order to comply with Policy DM4 of the Development Management Development Plan Document 2017 and Policy SI 7 of the London Plan 2021.

**39. Detailed Demolition and Construction Logistics Plan (PRE-COMMENCEMENT)**

(a) No development shall commence until a Detailed Construction Logistics Plan (CLP) for each building phase has been submitted to and approved in writing by the Local Planning Authority.

(b) The Detailed CLPs shall conform with Transport for London's Construction Logistics Planning Guidance (2021) and shall include the following details:

- i) Site access and car parking arrangements;
- ii) Delivery booking systems;
- iii) Construction phasing and agreed routes to/from the development;
- iv) Timing of deliveries to and removals from the site (to avoid peak times of 07.00 to 9.00 and 16.00 to 18.00 where possible);
- v) Travel plans for staff / personnel involved in construction;
- vi) Crane Lifting Management Plan (CLMP); and
- vii) Crane Erection and Dismantling.

(c) All construction works shall be carried out in accordance with the approved CLPs.

REASON: To provide the framework for understanding and managing construction vehicle activity into and out of the proposed development, encouraging modal shift and reducing overall vehicle numbers. To give the Local Planning Authority an overview of the expected logistics activity during the construction programme. To protect of the amenity of neighbour properties and to maintain traffic safety. And in order to comply with Policies T4 and T7 of the London Plan 2021.

#### **40. London Underground Asset Protection (PRE-COMMENCEMENT)**

1. Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide demolition details
- b) accommodate the location of the existing London Underground structures
- c) accommodate ground movement arising from the development construction thereof
- d) mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures
- e) provide details on the use of tall plant/scaffolding for the demolition phase
- f) demonstrate that any EMC emissions from any plant or equipment to be used on the site or in the finished structure will not adversely affect LU equipment or signalling
- g) demonstrate that the design allows for any emissions from London Underground's tunnel, tracks and ventilation shafts or emissions from the proposed development
- h) written confirmation will be required from Thames Water/whomever that any increased drainage or sewage from the site will not be discharged directly or indirectly into London Underground's drainage system.

2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) prior to commencement of each phase of the development provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent)

3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide details on the use of tall plant/scaffolding

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure and to be in accordance with Policy T3 of the London Plan 2021.

#### **41. Public Highway Condition (PRE-COMMENCEMENT)**

(a) No development shall commence until an existing condition survey of the carriageway and footway (surrounding the site on all adjacent roads and highways) has been undertaken in collaboration with the Council's Highways Maintenance team and submitted in writing to the Local Planning Authority.

(b) Within one month of the completion of all development works, including any highway works, a final condition survey shall be undertaken of the highway areas identified in (a) in collaboration with the Council's Highways Maintenance team and submitted in writing to the Local Planning Authority.

(c) The applicant shall ensure that any damages caused by the construction works and highlighted by the before-and-after surveys are addressed and the condition of the public highway is reinstated to the satisfaction of the Council's Highways Maintenance team in accordance with an associated Highway Agreement.

REASON: To ensure the construction works do not result in the deterioration of the condition of the public highway along the site and in order to comply with Policies T4 and T7 of the London Plan 2021.

#### **42. Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)**

(a) No development shall commence until a Demolition Environmental Management Plan (DEMP) for the building has been submitted to and approved in writing by the Local Planning Authority.

(b) No development shall commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

(c) The DEMP and CEMP shall provide details of how demolition and construction works respectively are to be undertaken and shall include:

- i. A construction method statement which identifies the stages and details how works will be undertaken;

- ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;
- iii. Details of plant and machinery to be used during demolition/construction works;
- iv. Details of an Unexploded Ordnance Survey;
- vi. Details of community engagement arrangements;
- vii. Details of any acoustic hoarding;
- viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);
- ix. Details of external lighting; and
- x. Details of any other standard environmental management and control measures to be implemented.

(e) Demolition and construction works shall only be carried out in accordance with the approved DEMP and CEMP or as otherwise agreed in writing with the Local Planning Authority.

REASON: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality. And in order to comply with Policies T4 and T7 of the London Plan 2021 and with Policies DM19, DM21 and DM23 of the Development Management Development Plan Document 2017.

#### **43. Updated Air Quality Assessment (Pre-superstructure)**

An updated Air Quality Assessment, including an Air Quality Neutral report, shall be submitted to the Local Planning Authority for its written approval prior to the commencement of above ground works of the residential development for the development hereby approved. Once approved the development shall be completed in accordance with the approved details.

REASON: To safeguard residential amenity and protect air quality and the amenity of the locality and in order to comply with policy SI1 of the London Plan 2021.

#### **44. Management and Control of Dust (PRE-COMMENCEMENT)**

(a) No development shall commence, save for investigative work, until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted to and approved in writing by the Local Planning Authority. The AQDMP shall be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:

- i) Monitoring locations
- ii) Mitigation measures to manage and minimise demolition/construction dust emissions during works;
- iii) Details confirming the site and all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london>;
- iv) Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site during the course of the demolitions, site preparation and

- construction phases in the event of Local Authority Inspection (Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM);
- v) An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);
  - vi) a Dust Risk Assessment for the works; and
  - vii) Lorry Parking, in joint arrangement where appropriate.

(b) Demolition and construction works shall only be carried out in accordance with the approved AQDMP.

REASON: To safeguard residential amenity and protect air quality and the amenity of the locality; and in order to comply with Policies SI1, T4 and T7 of the London Plan 2021.

#### **45. Combustion and Energy Plant (Compliance)**

Any gas boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%).

REASON: To prevent a deterioration in air quality within an Air Quality Management Area (AQMA) and as required by The London Plan 2021 Policy SI1.

#### **46. Business and Community Liaison Construction Group (PRE-COMMENCEMENT)**

- (a) For the duration of the demolition and construction works the developer and its contractors shall establish and maintain a Liaison Group having the purpose of:
- i. informing local residents and businesses of the design and development proposals;
  - ii. informing local residents and businesses of progress of preconstruction and construction activities;
  - iii. considering methods of working such as hours and site traffic;
  - iv. providing local residents and businesses with an initial contact for information relating to the development and for comments or complaints regarding the development with the view of resolving any concerns that might arise;
  - v. providing advanced notice of exceptional works or deliveries; and
  - vi. providing telephone contacts for resident's advice and concerns.

The terms of reference for the Liaison Group, including frequency of meetings, shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development. For the avoidance of doubt, this could comprise the Applicant's existing 'Business and Community Liaison Group '(BCLG) or an alternative agreed with the Council.

REASON: In order to ensure satisfactory communication with residents, businesses and local stakeholders throughout the construction of the development and enable compliance with London Plan 2021 Policy T7.

**47. Telecommunications (Compliance)**

(a) The placement of any telecommunications apparatus, satellite dish or television antenna on any external surface of the development is precluded, with exception provided for a communal satellite dish or television antenna for the units of accommodation, details of which are to be submitted to the Local Planning Authority for its written approval prior to the first occupation of the development hereby approved. The provision shall be retained as installed thereafter.

REASON: To protect the visual amenity of the locality and to be in accordance with Policy DM1 of the Development Management Development Plan Document 2017.

**48. Wind Mitigation (Pre-Superstructure)**

(a) Prior to above ground construction of 2 Berol Yard a programme of quantitative assessments shall be carried out and submitted to and approved in writing by the Local Planning Authority. The quantitative assessments shall be carried out to validate mitigation of on-site wind safety exceedances on the elevated levels and shall include:

- Wind safety exceedances on the accessible elevated terrace areas, to the point where safety exceedances no longer exist and are considered comfortable for proposed usages.
- The effectiveness of proposed wind mitigation measures, in order to alleviate wind conditions noted within the report, to conditions suitable for proposed usages.

The building shall not be occupied until all wind mitigation measures as described in the Wind Microclimate Report dated November 2022 and the further quantitative assessments, have been submitted to and approved in writing by the Local Planning Authority.

(b) The approved wind mitigation measures shall be implemented prior to the first occupation of the building and shall be maintained and functional and permanently retained thereafter for the lifetime of the building.

REASON: In order to prevent adverse impact on wind microclimate and to be in accordance with Policy D9 of the London Plan 2021 and Policy DM6 of the Development Management Development Plan Document 2017.

**49. Noise from building services plant and vents (Compliance)**

Noise emitted by plant equipment hereby permitted shall at all times remain 5dB(A) below background levels when measured at any nearby residential window or other noise sensitive receptor.

The plant shall be serviced regularly in accordance with manufacturer's instructions and as necessary to ensure that the requirements of the condition are maintained. If at any time the plant is unable to comply with this Condition, they shall be switched off and not used again until it is able to comply.

REASON: In order to protect the amenities of nearby residential occupiers and to be in accordance with Policy D14 of the London Plan 2021 and Policy DM1 of the Development Management Development Plan Document 2017.

**50. Anti-vibration mounts for building services plant / extraction equipment**  
(Compliance)

All plant and equipment installed shall be supported on adequate proprietary anti-vibration mounts as necessary to prevent the structural transmission of vibration and regenerated noise within adjacent or adjoining premises, and these shall be so maintained thereafter. If at any time the plant is unable to comply with this Condition, it shall be switched off and not used again until it is able to comply.

REASON: In order to protect the amenities of nearby residential occupiers and to be in accordance with Policy D14 of the London Plan 2021 and Policy DM1 of the Development Management Development Plan Document 2017.

**51. Signage and wayfinding** (Pre-occupation)

No development shall be occupied in a Phase of the development until a scheme for wayfinding signage has been submitted to and approved in writing by the Local Planning Authority for that Phase. The scheme shall include locations, material, mounting and mounting heights, equipment specifications, signage, and a maintenance and monitoring plan. The relevant Phase of the development shall thereafter be carried out in accordance with the approved details.

REASON: To ensure that the development provides appropriate signage and wayfinding and to be in accordance with Policies DM1, DM2, DM3 and DM8 of the Development Management Development Plan Document 2017.

**52. Berol House Blue Badge Parking** (Pre-occupation)

Prior to first occupation of Berol House, an assessment which demonstrates adequate provision for Blue Badge holder parking bays for Berol House shall be submitted to and approved in writing by the Local Planning Authority.

Once approved the development shall be completed in accordance with the approved details and retained as such thereafter for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure adequate provision for Blue Badge parking and to be in accordance with Policy T6.5 of the London Plan 2021.

**53. Public Art** (Pre-occupation)

Prior to first occupation/use of the final phase of the development, a public art/lighting installation scheme shall be submitted to and approved in writing by the Local Planning Authority. The approved public art/lighting scheme shall be installed prior to completion of the final phase of the development and shall be subsequently

maintained and retained thereafter, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that the development makes provision for public art and to be in accordance with Policy DM3 of the Development Management Development Plan Document 2017.

**54. Residential homes to be C3 use only (Compliance)**

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), or any Order revoking or re-enacting that Order, the residential units hereby approved shall be used solely as Class C3 dwellinghouses. The use of any unit as a House in Multiple Occupation, whether within Use Class C4 or as a sui generis HMO, is expressly prohibited unless planning permission is first obtained from the Local Planning Authority.

REASON: To prevent intensification of HMO use in an area where such uses would cause harm to local character, amenity and housing mix, and to ensure proper control over any future change of use; and to ensure the development safeguards the amenity of future occupiers and neighbouring residents, having regard to the potential impacts associated with HMO occupation patterns. And to accord with Policy H9 of the London Plan 2021 and Policy DM1 and DM17 of the Development Management Development Plan Document 2017.

## INFORMATIVES

1. Working with the applicant. In dealing with this application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our development plan comprising the London Plan 2021, the Haringey Local Plan 2017 along with relevant SPD/SPG documents, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably. In addition, where appropriate, further guidance was offered to the applicant during the consideration of the application.
2. Community Infrastructure Levy. The applicant is advised that based on the information submitted, the Mayoral CIL charge will be approximately £1,905,709.63 (26,807sqm x £71.09). The Haringey CIL charge will be approximately £2,828,364.32 (24,016sqm x £117.77). The total CIL liability would be £4,734,073.95.

This will be collected by Haringey should the scheme be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment.

3. Hours of Construction Work. The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours: -  
8.00am - 6.00pm Monday to Friday  
8.00am - 1.00pm Saturday  
and not at all on Sundays and Bank Holidays.
4. Party Wall Act. The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.
5. Numbering New Development. The new development will require numbering. The applicant should contact the Local Land Charges at least six weeks before the development is occupied (tel. 020 8489 3472) to arrange for the allocation of a suitable address.
6. Asbestos Survey prior to demolition. Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.
7. Dust. The applicant must ensure that any issue with dust where applicable is adequately addressed so as to ensure that the effects of the construction work upon air quality is minimised.

8. Written Scheme of Investigation – Suitably Qualified Person. Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.
9. Deemed Approval Precluded. The condition addressing a Written Scheme of Investigation (WSI) is exempt from deemed approval under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
10. Maximise Water Efficiency. Developers are encouraged to maximise the water efficiency of the development. Thames Water offer environmental discounts for water efficient development which reduce the connection charges for new residential properties. Further information on these discounts can be found at: <https://www.thameswater.co.uk/developers/charges>
11. Minimum Water Pressure. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
12. Paid Garden Waste Collection Services. Haringey operate a paid garden waste collection service; the applicant is advised that any waste storage area should include space for a garden waste receptacle. For further information on the collection service please visit our website: [www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/recycling/garden-waste-collection](http://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/recycling/garden-waste-collection)
13. Sprinkler Installation. The London Fire and Emergency Authority recommends that sprinklers are considered for new development and major alterations to existing premises. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers and can reduce the risk to life.
14. Designing out Crime Officer Services. The applicant must seek the continual advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) to achieve accreditation. The services of MPS DOCOs are available free of charge and can be contacted via [docomailbox.ne@met.police.uk](mailto:docomailbox.ne@met.police.uk) or 0208 217 3813.
15. Land Ownership. The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within their ownership.
16. Site Preparation Works. These comprise site preparation and temporary works including but not limited to the demolition of existing buildings and structures; surveys; site clearance; archaeological works; ground investigation; remediation; the erection of fencing or hoardings; the provision of security measures and lighting; the erection of temporary buildings or structures associated with the development; the laying, removal or diversion

of services; construction of temporary access; temporary highway works; and temporary internal site roads.

17. s106 Agreement and s278 Agreement. This planning permission must be read in conjunction with the associated s106 Agreement/Deed of Variation and any associated s278 Highway Act Agreement(s).
18. Revised Fire Statement required with any revised submission. The applicant is advised that if there are any changes to the scheme which require subsequent Section 96a or Section 73 applications following the grant of any planning permission, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.
19. Building Control - All building work carried out should meet current building codes and regulation requirements. The Council's Building Control Service ensures that buildings are designed and constructed in accordance with the Building Regulations and associated legislation. Please Note: It is the responsibility of those carrying out the work to ensure that the provisions of the regulations are fully met. The role of Building Control is only to check that they do so.
20. Building Regulations – Soundproofing. The implementation of a suitable soundproofing scheme is now required as part of the Building Regulations 1991 - Part E. The applicant is now therefore required to formally consult the Council's Building Control Department, River Park House, 225 High Road, N22 8HQ (Tel. 020 8489 5504).
21. Thames Water - Sewage Pumping Station. The proposed development is located within 20m of a Thames Water Sewage Pumping Station. Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.

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## Appendix 2 - Report to Planning Sub-Committee (PSC) for HGY.2023.0261

Planning Sub Committee – 03 July 2023

### REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

#### 1. APPLICATION DETAILS

**Reference No:** HGY/2023/0261

**Ward:** Tottenham Hale

**Address:** Berol Quarter, Ashley Road, London N17 9LJ

**Proposal:** Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.

**Applicant:** Berol Quarter Limited (Berkeley Square Developments)

**Ownership:** Private

**Case Officer Contact:** Philip Elliott

**Date received:** 24/01/2023 **Last amended date:** N/A

1.1 The application has been referred to the Planning Sub Committee for decision as the planning application is a major application

#### 1.2 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal is a well-designed mixed-use scheme which would primarily provide Build to Rent accommodation (BtR) alongside an uplift over the existing of approximately 2900sqm (GIA) of commercial space (Use Class E(a)) that fulfils the requirements of the site allocation.
- The proposal provides 35% affordable housing consisting of London Living Rent and Discount Market Rent (DMR) housing in line with Policy H11 of the London Plan and the Council's Housing Strategy.
- The proposal provides a high-quality tall building and design that is supported by the QRP and would act as a landmark within the wider area.
- The proposal provides significant new employment opportunities.
- The proposal provides an additional community space, a new bridge head to support the delivery of a potential future bridge over Watermead Way and the railway into Hale Village and would also make substantial contributions to infrastructure through the community infrastructure levy (CIL).
- The proposal provides a high quality of BtR accommodation.
- The impact on neighbouring amenity is considered to be in line with BRE guidance and acceptable.

- The proposed development would not have any further impact on the built historic environment given the context within which it would be located.
- The proposal is a car free development (except for blue badge and interim arrangements) and the impact on transportation is acceptable.
- The proposal achieves a high level of sustainability, would be zero carbon and would provide a sustainable design with provision to connect to a future district energy network (DEN).
- The proposed landscaping would enhance tree provision and greenery.
- The Health and Safety Executive (HSE) have considered the scheme and are content with the proposals.

## 2. RECOMMENDATION

- 1.1 That the Committee resolve to GRANT planning permission and that following Stage II referral to the GLA, the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below.
- 1.2 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to make any alterations, additions, or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.
- 1.3 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 01/09/2023 or within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in their sole discretion allow; and
- 1.4 That, following completion of the agreement referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of conditions.

**Conditions** (the full text of recommended conditions is contained in Appendix 2 of this report)

- 1) 3-year time limit
- 2) Approved Plans & Documents
- 3) Phasing Plan
- 4) Accessible Accommodation
- 5) Commercial Units - Opening Hours
- 6) Commercial Units – Class E Only

- 7) Quantum of development
- 8) BREEAM Certificates
- 9) Residential – Noise Attenuation
- 10) Residential – Noise Attenuation from commercial/community
- 11) Fire Statement
- 12) Landscape Details
- 13) Playspace
- 14) Surface Water Drainage
- 15) Surface Water Network (Thames Water)
- 16) Water Network Capacity (Thames Water)
- 17) Flood Warning and Evacuation Plan (FWEP)
- 18) Water Efficiency Condition
- 19) Biodiversity
- 20) Lighting
- 21) External Materials and Details
- 22) Living roofs
- 23) Landscape and ecological management plan (LEMP)
- 24) Energy Strategy
- 25) DEN Connection
- 26) Overheating
- 27) Overheating Building User Guide
- 28) Circular Economy
- 29) Whole Life Carbon
- 30) Secured by Design
- 31) Written Scheme(s) of Investigation for Archaeology
- 32) Land Contamination
- 33) Unexpected Contamination
- 34) Car & Cycle Parking Management Plan
- 35) Cycle Parking
- 36) Delivery and Servicing Management Plan
- 37) Site Waste Management Plan
- 38) Waste Management Plan
- 39) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
- 40) London Underground Asset Protection (PRE-COMMENCEMENT)
- 41) Public Highway Condition (PRE-COMMENCEMENT)
- 42) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
- 43) Updated Air Quality Assessment
- 44) Management and Control of Dust
- 45) Combustion and Energy Plant
- 46) Combined Heat and Power (CHP) Facility
- 47) Business and Community Liaison Construction Group
- 48) Telecommunications
- 49) Wind Mitigation
- 50) Noise from building services plant and vents
- 51) Anti-vibration mounts for building services plant / extraction equipment

## 52) Signage and wayfinding

**Informatives**

- 1) Working with the applicant
- 2) Community Infrastructure Levy
- 3) Hours of Construction Work
- 4) Party Wall Act
- 5) Numbering New Development
- 6) Asbestos Survey prior to demolition
- 7) Dust
- 8) Written Scheme of Investigation – Suitably Qualified Person
- 9) Deemed Approval Precluded
- 10) Maximise Water Efficiency
- 11) Minimum Water Pressure
- 12) Paid Garden Waste Collection Service
- 13) Sprinkler Installation
- 14) Designing out Crime Officer Services
- 15) Land Ownership
- 16) Site Preparation Works
- 17) s106 Agreement
- 18) Revised Fire Statement required with any revised submission
- 19) Building Control
- 20) Building Regulations – Soundproofing
- 21) Thames Water - Sewage Pumping Station

**Section 106 Heads of Terms (HoTs):****1) On-site affordable housing (DMR and LLR)**

Affordable Housing Scheme to be submitted for approval prior to commencement of development which shall include the following:

- a. Minimum of 35% by habitable room (202 habitable rooms).
- b. Tenure mix – 30% London Living Rent (LLR) Housing and 70% Discount Market Rent (DMR) Housing.
- c. Proposed Number of Habitable Rooms by tenure: DMR = 78 (2-bed) and 64 (3-bed); LLR = 36 (2-bed) and 24 (3-bed).
- d. Triggers for provision - No occupation of the Market Rent Housing Units until all of the Affordable units have been delivered.
- e. Location of different tenures (a plan of the affordable housing showing where both DMR and LLR is located).
- f. Affordable housing residents to have access to the same communal amenity and play space as Market Rent housing.

**2) Affordability**

- a. Tenure mix – 30% London Living Rent (LLR) Housing and 70% Discount Market Rent (DMR) Housing.

- b. DMR housing = 2 Bedroom: 75% of Market Rent and 3 Bedroom: 65% of Market Rent and a commitment to retaining rents calculated at these levels and using the same methodologies.
- c. Provide a dedicated 6-month marketing priority period for local Haringey Residents for the affordable units which shall be completed 12 to 6 months prior to Practical Completion with evidence of the marketing provided to the Council. Families shall be prioritised for the DMR family 3-bedroom units.
- d. A commitment to developing an approach to allocations jointly with the Council for both the LLR and DMR units. That process shall ensure allocations and lettings align with the Council's Intermediate Housing Policy with a commitment to prioritise households with children for the two- and three-bed DMR units, and to ringfence two- and three-bed LLR units for households with children.
- e. Evidence of the chosen tenants shall be provided to show compliance.

**3) Viability Review Mechanism**

- a. Early-Stage Review if not implemented within 2 years in whole or in part; and
- b. Development Break review – review if construction is suspended for 2 years or more.

**4) Build to Rent (BtR) Obligations**

- The homes shall be held under a covenant for at least 15 years (apart from affordable units, which shall be secured in perpetuity);
- A clawback mechanism if BTR homes are sold
- Unified ownership and management of the private and affordable elements of the scheme;
- BtR housing shall be provided in accordance with an approved BtR marketing and letting scheme to be submitted for approval 12 to 6 months prior to Practical Completion.
- Not to occupy or cause or permit the occupation of any BtR Housing Unit until a BtR Management Plan has been submitted to and approved by the Council. The BtR Management Plan shall incorporate the following requirements, unless otherwise agreed in writing with the Local Planning Authority:
  - a) Each BtR Housing Unit shall be self-contained and let separately for private Residential Use;
  - b) Rent and service charge certainty shall be provided for the tenancy period on a basis made clear before the tenancy agreement is signed including any annual increases, which should be formula-linked;
  - c) Longer tenancies (three years or more) shall be made available to all tenants;

- d) Each lease of each BtR Housing Unit shall contain a break clause allowing the tenant to end the lease with a month's notice any time after the first six months of the lease;
- e) Providers must not charge up-front fees of any kind to tenants or prospective tenants outside of deposits and rent-in-advance.
- f) The BtR Housing Units shall be managed as a whole by a single professional property manager which:
  - i. provides a consistent and quality level of housing management,
  - ii. has regular on-site presence,
  - iii. is part of an accredited ombudsman scheme,
  - iv. is a member of the British Property Federation or RICS;
  - v. complies with the RICS Private Rented Sector Code,
  - vi. has a complaints procedure.
- g) Details of the waste collection strategy for the BtR Housing Units, including a commitment to a period of monitoring (to be agreed but likely 1 year post occupation) and reporting of waste / recycling volumes and making a payment of £100,000.00 to the Council where twice weekly refuse collections are required (to cover the cost of an additional vehicle) subject to monitoring results. Details of the monitoring shall be submitted to the LPA and agreed prior to occupation as part of the s106 obligation.

**5) Additional Affordable Workspace**

In the event that the construction of Berol House has not commenced by the earlier of:

- A) June 2028, or;
- B) Practical Completion of 2 Berol Yard -

Then Retail Unit 2 (221sqm) shall be allocated as "Additional Affordable Workspace" and subject to a discount of 20% of the prevailing market rent until the later of:

- A) 3 years from the date of Practical Completion of 2 Berol Yard; or
- B) The date of Practical Completion of Berol House.

**6) Commercial Strategy**

Prior to the occupation of both buildings, provide an updated Commercial and Retail strategy which identifies how the proposed uses would complement and enhance the commercial offer in Tottenham Hale, considering the wider regeneration.

**7) Employment & Skills**

- Submission of an employment and skills plan
- No less than 20% of the peak construction workforce to be Haringey residents
- Provision of skills-based training to the 20% referenced above

- 5% of the peak workforce to be provided with traineeships
- Provision of a construction apprenticeships at one per £3m development construction cost up to a maximum of 10% of total construction workforce
- Provision of a £1,500 support contribution per apprentice
- Provision of no less than five STEM/career inspirational sessions per construction phase
- Regular liaison with the Council to allow local businesses and suppliers to tender for works
- Other requirements as agreed in discussions with the Council's Employment and Skills Officer
- A commitment to being part of the borough's Construction Programme for construction and occupation.
- Work with the Haringey Employment and Recruitment Partnership - employment and training opportunities to identify and promote construction jobs during the delivery of both Berol House and 2 Berol Yard.
- Designate a named contact to ensure efficient management and supply of local Council residents for employment and training opportunities.
- Participate in the Haringey Construction Partnership.

**8) Public Art**

- Not to occupy or permit the occupation of any BtR Housing Unit until a public art/lighting installation scheme has been submitted to the council, approved, and implemented.
- For a period of 10 years from the date of first occupation of the BtR Housing Units, an external space within the Berol Square, of not less than 5m x 5m shall be provided which shall be available for not less than 3 months of each year for a temporary public art installation, to showcase Tottenham talent

**9) Future proofing bridge connection**

- Not to occupy or permit the occupation of any BtR Housing Unit until the new public access stairway, lift, and bridgehead have been constructed as part of the 2 Berol Yard building.
- To provide a permissive path right of access for members of the public to pass, with and without bicycles to the bridge head.
- To provide a bicycle track within the public access stairway.
- To maintain the public access stairway, public access lift, and landing area at no expenses to the Council, including all lighting, cleaning, and the like.
- Prior to the construction of the future potential bridge (not by the applicant) install glazing to the external façade to provide an additional

winter garden space as an extension to the 2 Berol Yard Cultural and Arts Space (Use Class F2 Community / Affordable Workspace).

- Produce a feasibility study for the bridge over Watermead Way and the railway, the study should include design options and costings for the proposal.
- To use best endeavours to work with those constructing the bridge to ensure its delivery by guaranteeing that whenever the bridge can come forward the bridge builder can connect to their landing stairs and lift, which will be freely available for bridge users.
- Input from an accessibility expert shall be sought to determine the best arrangement of the lift and stair and a channel for bicycles should be incorporated into the stairs.

#### **10) Cultural and Arts Space**

- 161sqm of Cultural and Arts Space (Use Class F2 Community / Class E Affordable Workspace) floorspace to be constructed on the first floor of 2 Berol Yard - plus public gallery and winter garden area until the potential future bridge is opened.
- Not to occupy or permit the occupation of any BtR Housing Unit until the Cultural and Arts space has been constructed to CAT A standard and first refusal of a lease to be offered to the Council.
- Grant a 15-year Lease of the space, for use by Made by Tottenham (or other such nominated body involved with the arts, creative trade, local industry), or alternative occupier agreed in consultation with the Council with a minimum discount of 20% of the prevailing market rent and a rent-free period of 3 years. The Lease shall also include a right to renew for 2 further 5-year periods, subject to agreement by both parties.

#### **11) Public Realm**

- Public access to footpaths, cycleways, open spaces, and the Cultural and Arts Space, including the potential future bridgehead provided via a Permissive Path right for public, visitors and the like to all routes.
- Submit and implement an Approved Public Access Plan.
- Maintain development estate public realm areas in accordance with the standards of good estate practice.

#### **12) National Health Service (NHS) Contribution**

Provide a capped contribution of £25,000 prior to Practical Completion of 2 Berol Yard to support local NHS services.

#### **13) Travel Plans (Commercial and Residential Travel Plans (£3,000 contribution per plan))**

A requirement for detailed travel plans to be submitted for approval prior to occupation and must include:

- Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) to work in collaboration with the Council for a minimum of five years
- Provision of welcome induction packs containing public transport and cycling/walking information, map, and timetables, to every new occupant.
- A commitment to liaise with Zipcar to understand utilisation of nearby Car Club bays.

**14) Car Club**

A commitment to provide residents with three years car club membership including a £50 annual credit for those who register.

**15) Car Capping**

No future occupiers will be entitled to apply for a residents or business parking permit under the terms of the relevant Traffic Management Order controlling on-street parking in the vicinity of the development. £5,000 for revising the associated Traffic Management Order.

**16) Construction Logistics/Monitoring contribution**

A payment of £20,000.00 to be paid to the Council - payable as £10,000.00 on commencement of each building.

**17) Considerate Constructors Scheme**

A commitment to sign up to the scheme for the entirety of construction works.

**18) Ultrafast broadband**

All rooms of accommodation and commercial spaces must have access to ultrafast broadband connections (above 100MB/s).

**19) Carbon Management & Sustainability - Future connection to District Energy Network (DEN)**

- An amended energy statement is to be provided on first occupation of the development.
- Estimated carbon offset contribution, plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO<sub>2</sub> at the Energy Plan and Sustainability stages (See Carbon Offsetting below for more detail).
- Be Seen commitment to uploading energy data
- A covenant to comply with the Council's standard DEN specification for the building DEN and for any components of the area wide DEN installed on site.
- Submission of Energy Plan for approval by LPA
- Sustainability Review

-

**20) Carbon offsetting**

Provision of a contribution to offset the carbon emissions of the development where not met on site against the zero-carbon target. Estimate of the carbon offset figure is £327,750.00 for the whole development which is to be reviewed once the amended energy statement has been assessed by the Council. A management fee of 10% is also required (estimate: £32,775)

**21) Monitoring costs**

Based on 5% of the financial contribution total, and £500 per non-financial contribution.

**22) Securing Design Quality**

Retain the existing architects for both buildings as Design Guardians to safeguard the design quality.

**23) Berol House Relocation Strategy**

Submission of a relocation strategy to be submitted prior to construction to identify how existing occupants within Berol House would be supported to find new suitable premises.

1.5 In the event that members choose to make a decision contrary to officers' recommendation members will need to state their reasons.

1.6 That, in the absence of the agreement referred to in resolution (2.1) above being completed within the time period provided for in resolution (2.3) above, the planning permission be refused for the following reasons:

1. In the absence of a legal agreement securing 1) the provision of on-site affordable housing and 2) viability review mechanisms the proposals would fail to foster a mixed and balanced neighbourhood where people choose to live, and which meet the housing aspirations of Haringey's residents. As such, the proposals would be contrary to London Plan Policies GG1, H4, H5 and H6, Strategic Policy SP2, and DM DPD Policies DM11 and DM13, and Policy TH12.
2. In the absence of a legal agreement securing the Build to Rent (BtR) obligations the proposals would fail to meet the requirements of London Plan policy H11 and. as such, the proposals would be contrary to that policy.
3. In the absence of a legal agreement securing financial contributions towards infrastructure provision (the Future proofing bridge connection, Cultural & Arts Space, public art, public realm, and other Transport Contributions), the scheme would fail to make a proportionate contribution towards the costs of providing the infrastructure needed to support the comprehensive development of Site Allocation TH6. As such, the proposals are contrary to

London Plan Policy S1, Strategic Policies SP16 and SP17, Tottenham Area Action Plan Policies AAP1, AAP11 and TH6 and DM DPD Policy DM48.

4. In the absence of legal agreement securing 1) a Travel Plan and financial contributions toward travel plan monitoring, 2) Traffic Management Order (TMO) amendments to change car parking control measures the proposals would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T5, T1, T2, T3, T4 and T6. Spatial Policy SP7, Tottenham Area Action Plan Policy TH4 and DM DPD Policy DM31.
  5. In the absence of an Employment and Skills Plan the proposals would fail to ensure that Haringey residents' benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy E11 and DM DPD Policy DM40.
  6. In the absence of a legal agreement securing the implementation of an energy strategy, including the prioritisation of a connection to a DEN, and carbon offset payments - the proposals would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policy SI 2 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and SA48.
  7. In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme and the borough's Construction Partnership, the proposals would fail to mitigate the impacts of demolition and construction and impinge the amenity of adjoining occupiers. As such the proposal would be contrary to London Plan Policies D14, Policy SP11 and Policy DM1.
- 1.7 In the event that the Planning Application is refused for the reasons set out in resolution (2.6) above, the Head of Development Management (in consultation with the Chair of Planning sub-committee) is hereby authorised to refuse any further application for planning permission which duplicates the Planning Application provided that:
- (i) There has not been any material change in circumstances in the relevant planning considerations, and
  - (ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
  - (iii) The relevant parties shall have previously entered into the agreements contemplated in resolution (2.1) above to secure the obligations specified therein.

## **CONTENTS**

- 3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS
- 4.0 CONSULATION RESPONSE
- 5.0 LOCAL REPRESENTATIONS
- 6.0 MATERIAL PLANNING CONSIDERATIONS
- 7.0 COMMUNITY INFRASTRUCTURE LEVY
- 8.0 RECOMMENDATION

## **APPENDICES:**

- Appendix 1: Planning Conditions & Informatives
- Appendix 2: Plans and Images
- Appendix 3: Internal and External Consultee representations
- Appendix 4: Neighbour representations
- Appendix 5: Planning Sub-Committee Minutes 7<sup>th</sup> Nov
- Appendix 6: QRP 13<sup>th</sup> July 2022
- Appendix 7: QRP 19<sup>th</sup> Oct 2022
- Appendix 8: QRP 1<sup>st</sup> March 2023
- Appendix 9: DM Forum Notes
- Appendix 10: GLA Stage 1 Response
- Appendix 11: Plans and Documents List

### 3.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

#### 3.1. Proposed development

3.1.1. Planning permission is sought to refurbish and extend Berol House to provide workspace and retail accommodation; and build a new mixed use building comprising Build to Rent (BtR) homes and commercial, retail, and community space at 2 Berol Yard. The description of development is as follows:

*“Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace and the redevelopment of 2 Berol Yard to provide new residential homes, Use Class E floorspace and associated landscaping, public realm improvements, car and cycle parking and other associated works.”*

3.1.2. In Figure 1 below shows the application site outlined in a dashed red line with the proposed buildings highlighted red:

*Figure 1 - Berol Quarter site plan*



3.1.3. The proposed development has the following three main components:

1. **Berol House**,

Retained to the west of the site. The building would be refurbished, and a three-storey extension would be erected at roof level covering the full extent of the roof plane on two of the three new floors. The third floor would be set back at the north and south and to a lesser extent to the east. An undercroft pedestrian route through Berol House (known as Berol Passage) would be added to increase west-east permeability through the building.

## 2. **2 Berol Yard,**

Located to the east of Berol House at the eastern part of the site. The building would be 32 storeys with a lift overrun core rising above the highest part of the main building, the upper floors are rotated at an angle to the ground floor.

The western elevation of the ground floor would run parallel with Berol House with a 10.5m gap forming a new street between the two. The southern elevation would run parallel with the One Ashley Road building to the south with a minimum distance of 10.2m. The eastern elevation would run parallel with Watermead Way to the east with the northern elevation running parallel with The Gessner to the north.

## 3. **Public Realm.**

Comprising paving, street planting, and street furniture would connect the buildings on the ground floor. There would be a new public square located to the southwest corner of the site which would become a focal and navigation point for visitors and pedestrians.

### **Land use mix**

- 3.1.4. The scheme proposes a mix of residential and non-residential floorspace. 2 Berol Yard would comprise 604sqm of Class E accommodation which is expected to comprise shops, cafes, and restaurants at ground floor level and 160.2sqm of community space at first floor level. It would comprise 210 homes on floors 1 to 29 and associated amenity space on the podium and at level 30 in the form of a sky terrace.
- 3.1.5. Berol House will comprise 5492sqm (GIA) of Class E floorspace (3,294sqm (existing) and 2,198sqm uplift). There would also be 428sqm of amenity space on the roof. In total, the site proposes 6,359sqm (GIA) of Class E and F2 (community) floorspace.

### **Housing mix**

- 3.1.6. 210 Build to Rent (BtR) homes are proposed at 2 Berol Yard. Berol House would not include residential development. The total residential floorspace proposed at 2 Berol Yard is 24,016 sqm.
- 3.1.7. The proposed dwelling mix, unit size and unit quantity are set out in Table 1 below and would provide a mix of one, two, and three-bedroom homes. 10% of

the total homes would be provided as wheelchair accessible/adaptable homes. This equates to 22 wheelchair adaptable homes being proposed.

*Table 1 - Proposed Dwelling Mix*

Flat type	No. of homes	% of homes	Wheelchair/accessible homes
Studio	20	10%	16
1 Bed	48	23%	
2 Bed 3 Person	21	10%	0
2 Bed 4 Person	93	44%	
3 Bed 5 Person	17	8%	6
3 Bed 6 Person	11	5%	
<b>Total</b>	<b>210</b>	<b>100%</b>	<b>22 (10%)</b>

### **Affordable Housing**

- 3.1.8. 35% Discount Market Rent (DMR) affordable housing (by habitable room) is proposed. A total of 60 2-bed and 3-bed affordable homes would be provided. This would result in 202 affordable habitable rooms. 33% of the total two bed homes would be affordable and 78.6% of the total three bed homes would be affordable.
- 3.1.9. 30% of the 35% total affordable housing provision would be provided at London Living Rent (LLR). The remainder would be provided at a discount to market rent with 2-beds let at 75% of market rent, and 3-beds let at 65% of market rent. There would be twenty-six 2-beds let at 75% of market rent and sixteen 3-beds let at 65% of market rent. The LLR element would include twelve 2-beds and six 3-beds.

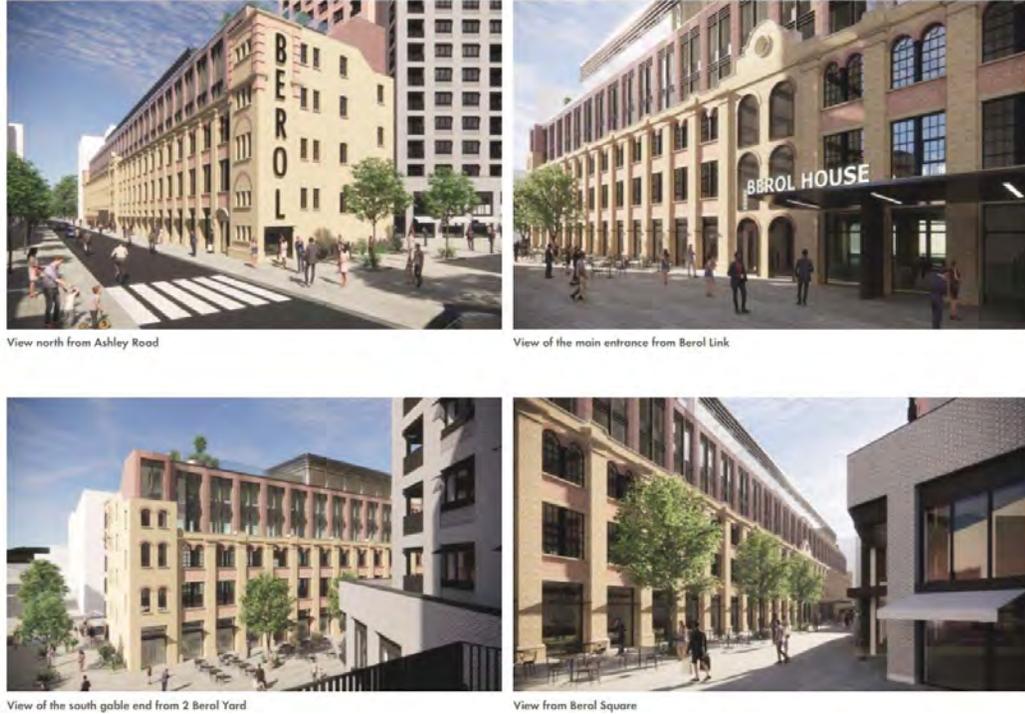
*Table 2 - Proposed Affordable numbers and rent cost*

Flat type	No. of homes	Rent % of market or LLR
2 Bed LLR	12	Let at LLR
2 Bed DMR	26	75%
3 Bed LLR	6	Let at LLR
3 Bed DMR	16	65%
<b>Total</b>	<b>60</b>	<b>N/A</b>

### **Height, scale, and massing**

- 3.1.10. Works to Berol House would comprise the addition of three new. Images of the proposed building can be seen below in Figure 2:

*Figure 2 - Berol House CGI images*



- 3.1.11. 2 Berol Yard would rise to 30 storeys plus the ground floor (effectively 32 storeys) with the lift overrun within the core rising above.
- 3.1.12. The building height would vary across the component blocks, details of the block heights are shown below in Table 3 with Figures 3 and 4 showing the different blocks:

*Table 3 - 2 Berol Yard Block Heights*

Block	Floors	Number of Storeys	Height (m)
A (SW facing)	17	18	62.92
B (West facing)	24	25	92.42
C (NE facing)	29	30	118.07
D (SE facing)	29	30	113.12
E (South facing)	5	6	31.67

*Figure 3 – Concept of 6 fragmented parts*

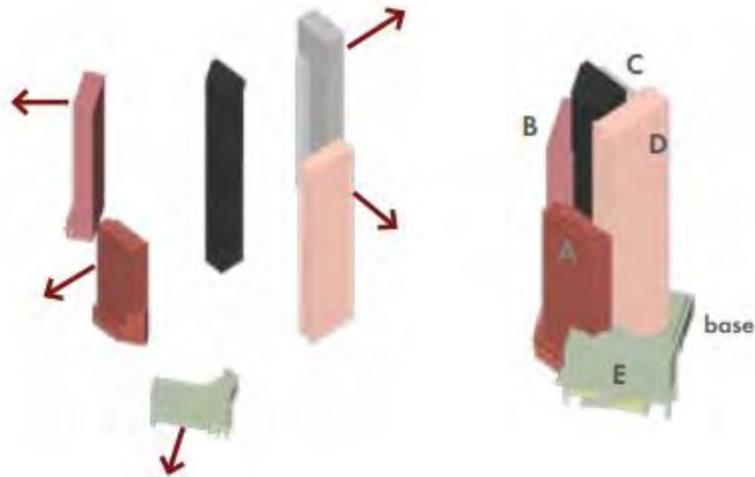


Figure 4 – Views of the different block elevations



### Materials and detailed design

#### *Berol House*

3.1.13. Berol House would be retained and enhanced. At ground floor level a series of openings would be created to enable access between Ashley Road and Watermead Way.

3.1.14. A three-storey extension is proposed, the first two storeys of the extension incorporate terracotta tiling to provide a cladded façade, the top floor would include a single storey glazed covering. The existing windows would be removed and replaced with powder coated metal double glazed windows.

#### *2 Berol Yard*

3.1.15. The design proposes a materials palette includes a range of brick colours including shades of black, red, grey, and green brick to reflect the surrounding context. The character and appearance of Berol House is referenced in the

tone of the brick used for the eastern, closest block and in the building's fenestration. The ranging building heights seek to provide a stepped form and a varied scale when viewed from the surrounding context. Figure 5 below shows a model of the proposed building looking from the northeast.

*Figure 5 – Image showing a model of the proposal looking southwest from the northeast of the site.*



*Public realm*

- 3.1.16. The proposal provides a new square and part of the west-east connection from Tottenham High Road to Hale Village and the Lea Valley beyond.
- 3.1.17. The proposal would incorporate the construction of a bridgehead, staircase, and new lift to a potential future bridge crossing over Watermead Way and the railway line to Hale Village. The bridgehead (which would include a landing platform), staircase, and new lift would be incorporated into the 6-storey south facing block situated within/alongside the west-east Link (shown below in Figure 6).

*Figure 6 – Image looking east showing the West-East Link and 6-storey block with potential future bridge shown in red in the background*

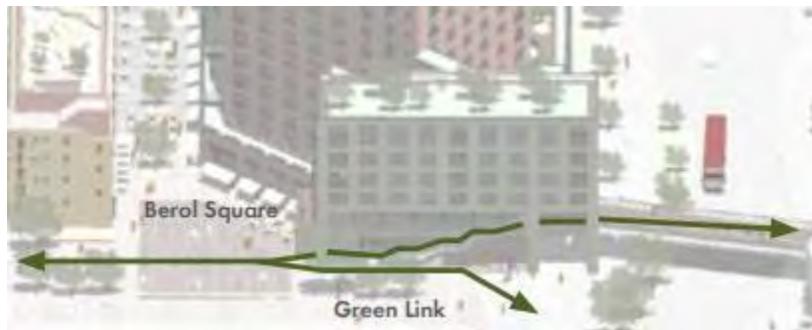


3.1.18. The proposal would provide the landing to receive the potential future bridge, public stairs, and lift within its footprint and would be managed and maintained by the landowner/managing agent. Figures 7 and 8 respectively show the proposed entrance to the public stair from Berol Square and how the link moves through the site from west to east with the potential future bridge shown.

*Figure 7 – Image showing the public stair to the bridge landing from the Square*



Figure 8 – Image looking north showing the stairs to the bridgehead within the site



3.1.19. The submission indicates that the public realm has the potential to support flexible uses, accommodate temporary events and art installations, facilitate movement, and potentially support socialisation. It would include tree planting, street furniture, planters, and sculptural elements to integrate with the east-west Green Link.

**Amenity and play space**

- 3.1.20. Communal amenity space totalling 554.2 sqm would be provided at podium level, and at levels 18 and 30 of 2 Berol Yard. The landscape design of the roof terraces seeks to create a series of different types of spaces with different functions.
- 3.1.21. The proposals include an external garden space at podium level, communal garden terrace on top of Block A at level 18 and an internal community space located at level 30. The podium level and external 18th floor rooftop gardens would be decked with raised planters with seating. The highest outdoor roof (above the eighteenth storey element) would provide a living roof beneath solar panels.
- 3.1.22. Berol House has been designed to incorporate a large private roof terrace which would be accessible to the occupants of the building.
- 3.1.23. Play provision for 2 Berol Yard would be located at the podium level and the upper roof terrace of the building accessed only by the residents. The garden would integrate 370sqm of play space for children aged 0 to 11 years old, comprising formal and informal play opportunities including, sand, balancing beams and boulders, a climbing structure and other play elements.
- 3.1.24. Play provision for over 11-year-old children would be located in Down Lane Park which is a 194m walk from 2 Berol Yard.
- 3.1.25. In addition to the communal amenity space created within the development, the homes within 2 Berol Yard would be served by private amenity space in the form of a balcony or roof terrace. Along the Watermead Way elevation of 2 Berol Yard, amenity space would be formed of internalised space.

**Access, servicing, and parking**

- 3.1.26. The proposal would be car-free except for accessible bays and parking. 8 accessible/blue badge parking spaces and a further 15 spaces for any potential future need. If demand increased, 12 spaces would be provided within 2 Berol Yard and three would be provided within the public realm. Car parking provision is shown in Table 4 below.

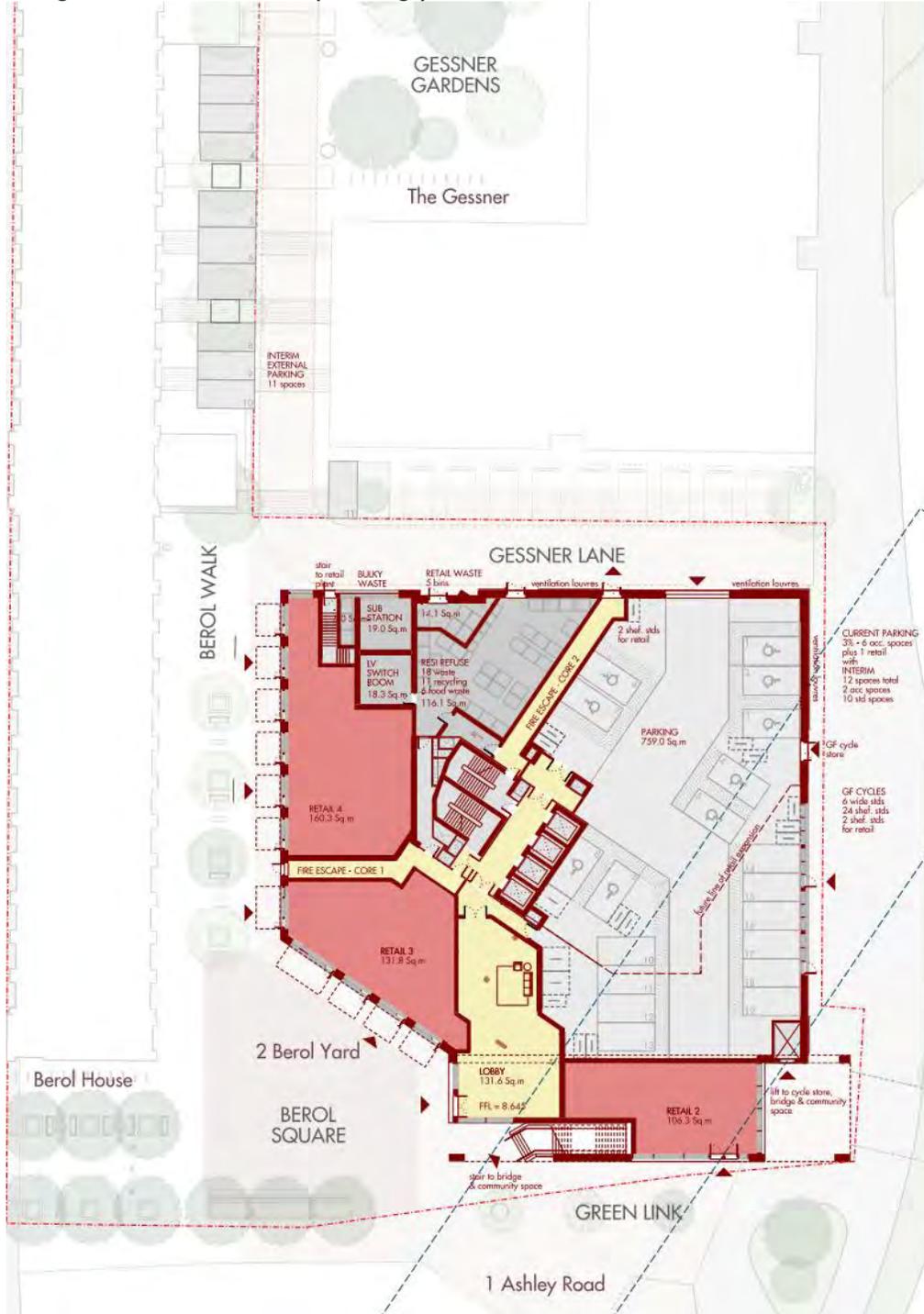
*Table 4 – Proposed Car Parking*

Building	Accessible Parking Spaces	Potential Future Spaces
Berol House	1 (commercial)	0
2 Berol Yard	7 (1 commercial/6 residential)	15 (residential)
<b>Total</b>	<b>8</b>	<b>15</b>

*Interim parking arrangements*

- 3.1.27. The Application is based on a phased approach to the delivery of the car parking, reflecting the obligations to the existing tenants in Berol House who have leases which provide for rights to park cars on the estate.

Figure 9 – Interim car parking provision



3.1.28. This layout would reduce the ground floor space – it would occupy Retail unit 1 (90.7sqm) and reduce the size of Retail unit 2 by 114.9sqm.

*Cycle Parking*

- 3.1.29. A total of 482 cycle parking spaces will be provided at 2 Berol Yard and Berol House. These would be provided at ground floor mezzanine level within 2 Berol Yard and ground floor level within Berol House. The cycle parking spaces would be for residents, as well as visitors and employees in the commercial and office units. Sheffield stands would be incorporated into the public realm for short term use.

*Deliveries and servicing*

- 3.1.30. Servicing and deliveries (excluding refuse collection arrangements) to the buildings would be undertaken on the servicing bays on Ashley Road and Watermead Way.

### **3.2. Site and Surroundings**

#### **Site**

- 3.2.1. The Site comprises 2 Berol Yard, which is currently a vacant plot of land adjacent to Watermead Way; and Berol House, the former Berol pencil factory, which is now an existing office building that runs north-south along Ashley Road. The site forms an L-shaped parcel of land with a total area of 2.67 hectares.
- 3.2.2. 2 Berol Yard is a vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Part of the car park is currently being utilised for the construction of the One Ashley Road scheme (part of the Related Argent 'Heart of Hale' development) to the south of the site.
- 3.2.3. Berol House is a three-storey locally listed building. The building was constructed in the early 1900s, having been constructed by 1913. The building was a former pencil factory owned by the Berol Company who produced Berol pencils at the site. Currently, Berol House is used as a serviced office building. The Berol Yard site has planning permission for redevelopment under HGY/2017/2044 which is described in the relevant planning history section below.
- 3.2.4. The site is bounded as follows:

To the north

by Cannon Factory which has permission for new homes and commercial space, as part of the Notting Hill Genesis/Home Ownership outline application (HGY/2016/4165). Beyond this the Harris Academy, which provides secondary education for 11–18-year-olds and is due to increase in capacity up to 1,500 students;

To the northeast

by 'the Gessner' which comprises 166 build to rent homes and commercial floorspace and was recently completed by the Applicant;

To the east

by Watermead Way and beyond this the railway line and Hale Village

To the south

by 'One Ashley Road', which has recently been constructed and was delivered by Related Argent as part of their 'Heart of Hale' development. One Ashley Road comprises two residential towers with the first three floors being retail and office space. Further south lies Tottenham Hale Station and the Tottenham Hale District Centre as well as Tottenham Hale Retail Park on the opposite side of Ferry Lane; and

To the west

by Ashley Road and the development plots of Ashley Gardens, Ashley House and Ashley Park which will provide new residential accommodation. Down Lane Park is located further west and northwest and is within a 2-minute walking distance of the site.

*Transport*

- 3.2.5. Vehicular access to the site is from Ashley Road to the west which connects to Hale Road (A503) / Watermead Way (A1055) to the south.
- 3.2.6. The access to Ashley Road from the south is proposed to be amended as part of wider highway improvements to the District Centre and Ashley Road. The improvement works would make the street one-way. A new loading bay adjacent to the east of the site on Watermead Way has been installed as part of works under permission HGY/2017/2044.
- 3.2.7. The site has a PTAL of 5-6a (where 1 is least accessible and 6b is most accessible). Tottenham Hale Underground Station is 180m from the site.
- 3.2.8. The site is also close to Tottenham Hale Bus Station.

*Heritage*

- 3.2.9. The closest Conservation Areas to the site are the High Road approximately 500m away to the west. Similarly, the nearest listed buildings are along the High Road as well as 62, High Cross Road N17 which is just off Monument Way approximately 450m away from the site.
- 3.2.10. The site is within Flood Zone 2 (the zone of moderate flood risk) and within an Air Quality Management Area (AQMA)The site is within the Tottenham Hale Growth Area and Tall Building Growth Area. It also falls within a Local Employment Area: Regeneration Area and allocated site TH6: Ashley Road South Employment Area within the Tottenham Area Action Plan (TAAP).

### Surroundings

- 3.2.11. The surrounding area is characterised by the site's immediate context within the Ashley Road South Masterplan (ARSM) and Tottenham Hale Housing Zone. The southern end of the site (south of the southern elevation of Berol House) falls within the emerging new Tottenham Hale District Centre. Figure 10 below shows the layout of the ARSM.
- 3.2.12. The allocated sites to the south of the ARSM (Ashley Road East and West) which form allocated site TH5 have been completed; with TH4 (in part) nearing completion and under construction; and TH10 (in part – eastern end) nearing completion by Related Argent for the 'Heart of Hale' District Centre redevelopment.
- 3.2.13. The site sits within the central and southeast sections of the ARSM. The ARSM is partially bounded by Down Lane Park to the north which also wraps around the western boundary and contains a children's playground, an existing nursery, tennis courts, bowling green, and BMX track. Ashley Road runs centrally through the masterplan.
- 3.2.14. On the opposite side of Ashley Road to Down Lane Park is the Harris Academy Tottenham which provides primary and secondary education. The site has been redeveloped to provide additional educational facilities for the Harris Academy (HGY/2015/3096).
- 3.2.15. The reservoirs to the east of the site (approximately 450m away) are a Site of Special Scientific Interest (SSSI) and a Special Protection Area & Ramsar site.
- 3.2.16. The buildings which form the ARSM are developed by the applicant and Notting Hill Genesis/Home Ownership, who have worked collaboratively to deliver a masterplan for the whole site. The following permissions are in place for the masterplan:
- **Cannon Factory and Ashley House** submitted by Notting Hill Genesis/Home Ownership. Permission HGY/2016/4165 was granted outline permission in 2018, with detailed planning permission granted later in the same year under reference HGY/2018/2353. The permission includes the demolition of existing buildings across the two sites and redevelopment consisting of the erection of three buildings of up to 17 storeys in height, to provide up to 3,600sqm of commercial floorspace, up to 256 homes, new public realm, landscaped amenity, and all other associated works. Construction has recently commenced.
  - **Ashley Gardens** comprises a two residential-led mixed use buildings of up to 11 storeys, providing up to 417 homes and has been developed by the Applicant. Planning permission was approved in 2017

(HGY/2017/2045) and amended in 2019 (HGY/2019/2804) and in 2021 (HGY/2021/1170). The first phase, known as Rosa Luxemburg Apartments, was completed in December 2021, and is now owned by the Council and the remainder of the scheme is nearing completion and will be named 'The Sessile'.

- **Ashley Park** (Ashley House) comprises a part six and eight storey residential-led mixed use building by Notting Hill Genesis/Home Ownership, to deliver up to 97 homes. Planning permission was granted on appeal in April 2020 (HGY/2019/0108). Construction has recently commenced.
- **The Gessner** (1 Berol Yard) comprises a 14-storey residential-led mixed use building, developed by the applicant. The Gessner was granted in 2018 as part of a wider hybrid application (HGY/2017/2044). Works at The Gessner were completed in 2021.

Figure 10 – Layout of the ARSM with the proposal shown edged in red



*Tottenham Hale District Centre Developments*

3.2.17. Tottenham Hale District Centre falls within Tottenham Housing Zone which has been allocated by the Greater London Authority (GLA) to provide 1,965 homes, 560 of which would be affordable.

- 3.2.18. Tottenham Hale also falls within the GLA's Upper Lea Valley Opportunity Area. This area will provide a minimum of 15,000 jobs and 20,100 new homes. The London Plan identifies a number of key growth points throughout the Upper Lea Valley including Tottenham Hale.
- 3.2.19. Table 5 below shows developments that are coming forward or have been delivered in and around Tottenham Hale. One Station Square (Millstream Tower) has been constructed within TH4: Station Square West. The Hale has a resolution to grant and is sited within that same allocation. SDP stands for Strategic Development Partnership and is the District Centre development being delivered by Related Argent and known as 'Heart of Hale'.

*Table 5 – Developments in and around Tottenham Hale*

Site	Applicant	Affordable Units	Private Homes	Student	Build to Rent	Total Homes
Ashley House and Cannon Factory	Notting Hill Genesis	133	123			256
One Station square (aka Millstream Tower)	BSD	117	11			128
Hale Wharf	Muse Developments Limited and the Canal and River Trust	177	220		108	505
Ashley Gardens	BSD	141	276			417
Berol Yard	BSD	14	4		166	184
Hale Village SW Plot (Anthology)	Anthology London	43	236			279
Monument Way	Newlon	54	0			54
Ashley Park	Notting Hill Genesis	35	62			97
SDP site	Argent	239	797			1036
Ashley Road Depot	LB Haringey	136	136			272
The Hale	Jigsaw PMG Tottenham Ltd		0	189		189
	<b>Sub Total</b>	<b>1089</b>	<b>1865</b>	<b>189</b>	<b>274</b>	
	<b>Total Housing (ex the Hale)</b>					<b>3228</b>
	<b>Total</b>					<b>3417</b>
	<b>Percentage Split</b>		32%	55%	6%	8%
	<b>Percentage Split (ex the Hale)</b>		34%	58%	0%	8%

### 3.3. Relevant Planning and Enforcement history

- 3.3.1. The site is subject to extant planning permission (HGY/2017/2044), which includes 1 Berol Yard, 2 Berol Yard (formerly the college site) and Berol House. Planning permission was granted on 8 June 2018 for:

*“Full planning permission for the demolition of the existing buildings within the Berol Yard site and retention of Berol House. Erection of two buildings between 8 and 14 storeys providing 166 homes, 891 sqm (GEA) of commercial floorspace (Class A1/A3/B1/D1), 7,275 sqm (GEA) of education floorspace (Class D1), car and cycle parking, open space, landscaping and other associated works.*

*Outline proposals (all matters reserved) for the alteration/conversion of ground, first and second floors of Berol House with up to 3,685 sqm (GEA) of commercial floorspace (A1/A3/B1/D1) and the introduction of a two storey roof*

*level extension introducing up to 18 homes, cycle parking and other associated works. Amendments to scheme including replacement of accommodation with "build-to-rent" and reconfiguration of internal residential and commercial layout."*

- 3.3.2. Reserved Matters for appearance, landscaping, layout, scale and access in relation to Berol House (pursuant to Condition 1 of planning permission HGY/2017/2044) were approved in 2020 (HGY/2020/0080). Since the original planning permission was granted there have also been several non-material amendments (under section 96a) that have been made to the scheme and conditions approved to enable part of the development.
- 3.3.3. The residential component at 1 Berol Yard (now known as The Gessner) and associated public realm has been completed and has been in operation since 2021. The remaining two plots of the original hybrid planning application, the development of which has not commenced, comprise 2 Berol Yard or the College Site (approved for education floorspace) and Berol House (approved for commercial floorspace and some residential in a roof level extension).
- 3.3.4. Case Reference HGY/2023/0241 is a linked Section 73 application for minor material amendments to the permitted scheme at Berol Yard, Ashley Road, London, N17 9LJ (planning permission ref: HGY/2017/2044). This application seeks to delete and amend existing conditions and add a condition to ensure that phases 3, 4, and 5 would be severed from HGY/2017/2044 upon implementation of any new planning permission being granted in respect of these phases.
- 3.3.5. The phasing strategy for Berol Yard was approved under HGY/2018/2164. Phases 1 and 2 involved the construction of The Gessner, hard landscaping from Ashley Road and between Berol House and The Gessner, and the delivery of the layby on Watermead Way. Phase 3 involved the Berol House refurbishment & extension, 4 completion of the public realm, and 5 construction of ADA College.
- 3.3.6. The granting of HGY/2023/0241 would effectively close off the outstanding phases of HGY/2017/2044 to allow any permission granted under this application to proceed without both applications being able to be constructed at the same time.

## **4.0 CONSULTATION RESPONSE**

### **4.1. Planning Committee Pre-Application Briefing**

- 4.1.1. The proposal was presented to the Planning Committee at a Pre-Application Briefing on 07 November 2022. The minutes of the meeting can be found in Appendix 5 Planning Sub-Committee Minutes 07 November 2022.

## **4.2. Quality Review Panel**

- 4.2.1. The scheme has been presented to Haringey's Quality Review Panel on the 13 July 2022, 19 October 2022, and 01 March 2023. The written findings of the panel can be found within Appendices 6, 7, and 8.

## **4.3. Development Management Forum**

- 4.3.1. The proposal was presented to a Development Management Forum on 06 October 2022.
- 4.3.2. The notes from the Forum are set out in Appendix 9.

## **4.4. Application Consultation**

- 4.4.1. The following were consulted on the application:

### Internal Consultees

- LBH Building Control
- LBH Carbon Management
- LBH Conservation Officer
- LBH Design Officer
- LBH Lead Local Flood Authority/Drainage
- LBH Pollution/Air Quality/Contaminated Land
- LBH Transportation
- LBH Waste Management/Cleansing
- LBH Arboricultural
- LBH Education
- LBH Housing
- LBH Regeneration
- LBH Economic Regeneration
- LBH Nature Conservation
- LBH Streets and Spaces Consultant
- LBH Construction Logistics

### External Consultees

- Environment Agency
- Greater London Authority
- Greater London Archaeology Advisory Service (GLAAS)
- London Fire Brigade
- Metropolitan Police - Designing Out Crime Officer
- Thames Water

- Transport for London
- London Underground/DLR Infrastructure Protection
- Network Rail
- Health and Safety Executive (HSE)
- Natural England
- NHS North Central London
- L.B. Waltham Forest
- National Grid Asset Protection Team

The following responses were received:

Internal:

**1) Building Control**

No comment received at time of publication. It is noted that this type of application is subject to the Planning Gateway One (PGO) service at HSE; and a full building regulations review will be undertaken as part of the Building Control process.

**2) LBH Carbon Management**

Conditions and heads of terms recommended.

**3) LBH Conservation Officer**

The proposed development would very positively retain the locally listed Berol House, would conserve, and unveil its heritage significance and would improve the urban quality of its setting, without any negative impact on the legibility, primacy, and significance of other heritage assets in the borough, and while delivering much needed improvements to the urban character of its locality. The proposed development is supported from the conservation perspective.

**4) LBH Design Officer**

Supports the proposal

**5) LBH Lead Local Flood Authority/Drainage**

Based on the details provided I can confirm that the comments raised by us (LLFA) have been adequately addressed. Conditions are recommended.

**6) Pollution (Carbon Management)**

No objection to the proposed development in respect to air quality and land contamination subject to planning conditions.

**7) Transportation**

No objections subject to conditions and heads of terms recommended.

**8) Waste and Street Cleansing**

The operational waste plan and management strategy for Berol Quarter is a detailed plan and provides clear information about how waste will be managed within individual units and externally. Sizing of the bin store appears to have been based on a twice weekly collection of waste and recycling from the outset. The store should be sufficient to store waste for one week.

**9) LBH Housing**

We support the new proposals for rents on the DMR units to be set at 75% for two-beds, and 65% for three-beds as it aligns much better with our policy position on affordability. We would like to see a commitment to retaining rents calculated at these levels and using the same methodologies going forward.

We also welcome the commitment to develop an approach to allocations jointly with the Council and would like to see that approach covering both LLR and DMR units. That process will need to ensure allocations and lettings align with our Intermediate Housing Policy. We would also like a commitment to prioritise households with children for the two- and three-bed DMR units, and to ringfence two- and three-bed LLR units for households with children.

**10) LBH Education**

These comments are from a school place planning perspective: There is sufficient primary and secondary capacity in Planning area 4 where this development is located to fulfil the potential child yield this development may result in.

**11) LBH Regeneration**

Observations relate to:

- Detail of the design of the Green Link adjacent to Watermead Way, and access to the future bridge link (these must be generous and welcoming)
- Landscaping materials and specification in relation to the wider Tottenham Hale (TH) context.
- Ensuring accessibility and inclusivity through adequate and user-friendly cycle storage and accessible vehicle parking.
- Clarity required on wayfinding/signage strategies to be developed in conjunction with emerging TH strategies.

**12) LBH Economic Regeneration**

The team, along with the Regeneration team, seeks a 25-year lease for the Cultural and Arts Space and for the Public Art, a peppercorn rent for the space and relief on auxiliary and service costs for the full term of the

lease, as well as a payment to contribute to the staffing and activation budget for the first 5 years.

Additional Affordable Workspace is sought at a peppercorn rent (along with relief on auxiliary and service costs) for the duration of the term. A payment plan is also sought which would contribute to the staffing and activation budget for this space.

**13) LBH Streets and Spaces Consultant**

We hope that with further engagement with the designers and landowner we can make adaptations to ensure the scheme and the way it relates to our planter and cycle lane in Watermead Way work together. The paving within the site should also match that adopted around the rest of the Tottenham Hale public realm. Other than the above we feel that the distances provided within the highway are adequate and that the proposals will contribute positively to this section of the Tottenham Hale scheme.

External:

**14) Environment Agency (EA)**

This application falls outside of our remit for comment. Although this site falls within Flood Zone 2, the advice falls under our national Flood Risk Standing Advice (FRSA).

**15) Mayor for London / Greater London Authority (GLA)**

(See Appendix 10 for full report)

Strategic issues summary

**Land use principles:** The development of this brownfield site for a high-density, mixed-use development is acceptable in principle

**Affordable housing:** Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant.

**Urban design:** Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential over-development.

**Transport:** Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan.

Other issues on **sustainable development** and **environment** also require resolution prior to the Mayor's decision-making stage.

The GLA Officer subsequently commented following sight of the latest QRP comments: GLA Officers are now generally satisfied that the urban design considerations in relation to height, massing, separation distances are appropriately resolved. Nevertheless, a full assessment against Policy D9 (including functional and environmental impacts) should be provided within the planning committee report and will be considered by GLA Officers at Stage 2.

The GLA Officer subsequently commented: The whole life carbon matters and circular economy matters are, on balance, considered to be largely addressed. Whilst some minor points have been raised within the attached spreadsheets, I am satisfied that these matters are acceptably resolved in this circumstance and no further work is required on behalf of the applicant team. I would recommend that the WLC Assessment Report (dated 25/05/2023) and the Detailed Circular Economy Statement (dated 25/05/2023) be included as an approved document on the draft decision notice.

**16) Greater London Archaeology Advisory Service (GLAAS)**

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. Condition and Informative recommended.

**17) Metropolitan Police - Designing Out Crime Officer**

No comment received at time of publication – However, a secured by design condition is recommended which would ensure that the proposed development would meet the principles of secure by design.

**18) Thames Water**

A condition relating to surface water is recommended and an informative due to closeness to a Thames Water Sewage Pumping Station. A condition is also recommended relating to ensuring the existing water network infrastructure has sufficient capacity to accommodate the development.

**19) Transport for London**

Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan.

**20) London Underground/DLR Infrastructure Protection**

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure. Therefore, we request that the grant of planning permission be subject to conditions to be discharged in a phased manner as and when they are completed.

**21) Health and Safety Executive (HSE)**

Following a review of the information provided with this consultation, HSE is content with the fire safety design, to the extent that it affects land use planning.

**22) Natural England**

Natural England has no comment on this application with regards to designated sites.

**23) NHS North Central London**

Using information on the proposed housing mix in the Planning Statement, the NHS HUDU Planning Contributions Model (HUDU Model) has been used to formulate a request for a minimum s106 contribution of £233,335.00 to “increase capacity of health infrastructure serving the proposed development”.

**24) L.B. Waltham Forest**

No comment.

**25) Crossrail 2**

No comment.

**26) National Grid Asset Protection Team**

No comment.

**5.0 LOCAL REPRESENTATIONS**

5.1 The following were consulted:

- 888 Neighbouring properties
- 7 site notices were erected close to the site.

5.2 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application was as follows:

No of responses:

- Objecting: 2

- Supporting: 2
- Comments: 1

5.3 The issues raised in these representations are detailed in Appendix 4 (Neighbour representations).

## 6.0 MATERIAL PLANNING CONSIDERATIONS

6.1 The main planning issues raised by the proposal are:

1. Principle of the development
2. Policy Assessment
3. Housing, Affordable housing and Policy H11 (Build to Rent)
4. Impact on the amenity of adjoining occupiers
5. Design and tall building assessment
6. Impact on heritage assets including affected conservation areas
7. Quality of Residential Accommodation
8. Social and Community Infrastructure
9. Transportation, parking, and highway safety
10. Air Quality
11. Energy, Climate Change and Sustainability
12. Urban Greening and Ecology
13. Trees and Landscaping
14. Wind and Microclimate
15. Flood Risk and Drainage
16. Waste and Recycling
17. Land Contamination
18. Archaeology
19. Fire Safety and Security
20. Conclusion

### 6.2 Principle of the development

#### Policy Background

- 6.2.1 The current National Planning Policy Framework NPPF was updated in July 2021. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process.
- 6.2.2 For the purposes of S38(6) of the Planning and Compulsory Purchase Act 2004 the Local Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies DPD and Tottenham Area Action Plan (TAAP) and the London Plan (2021).
- 6.2.3 A number of plans and strategies set the context for Tottenham’s regeneration. These documents should be read in conjunction with the TAAP. The application

site is located within a strategically allocated site – TH6 (Ashley Road South Employment Area).

- 6.2.4 The site allocation provides detailed site requirements and development guidelines to ensure the site’s potential is realised. The TAAP states that this forms a transition site between the denser District Centre and the surrounding residential area.
- 6.2.5 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps document took place between 16 November 2020 and 1 February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open questions about the issues and challenges facing the future planning of the borough and seeks views on options to address them. It has very limited material weight in the determination of planning applications.
- 6.2.6 The Council at the present time is unable to fully evidence its five-year supply of housing land. The ‘presumption in favour of sustainable development’ and paragraph 11(d) of the NPPF should be treated as a material consideration when determining this application, which for decision-taking means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusal or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.
- 6.2.7 Nevertheless, decisions must still be made in accordance with the development plan unless material considerations indicate otherwise (of which the NPPF is a significant material consideration).

*The London Plan*

- 6.2.8 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance that provide further guidance.

*Upper Lea Valley Opportunity Area Planning Framework*

- 6.2.9 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. A Development Infrastructure Study (DIFS) in relation to the OAPF was also prepared in 2015. The OAPF sets out the overarching framework for the area, which includes the application site.
- 6.2.10 The OAPF notes that Tottenham Hale is expected to be subject to substantial change, including for it to be designated as a District Centre. It notes that there is an opportunity to deliver new homes and jobs, a high-class transport interchange

with traffic calming; improved connections to the Lee Valley Regional Park and River Lee; and new retail and commercial spaces all set within a vastly improved public realm.

*Strategic Policies*

6.2.11 The site is located within the Tottenham Hale Growth Area as per Haringey's Spatial Strategy Policy SP1. The Spatial Strategy makes clear that in order to accommodate Haringey's growing population, the Council needs to make the best use of the borough's limited land and resources. The Council will promote the most efficient use of land in Haringey.

6.2.12 SP1 requires development in Growth Areas to maximise site opportunities, provide appropriate links to, and benefits for, surrounding areas and communities, and provide the necessary infrastructure whilst being in accordance with the full range of the Council's planning policies and objectives.

*Tottenham Area Action Plan*

6.2.13 The Tottenham AAP sets out a strategy for how growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers, and visitors. The plan sets area wide, neighbourhood and site-specific allocations. The AAP indicates that development and regeneration within Tottenham will be targeted at four specific neighbourhood areas including Tottenham Hale.

*TH6 (Ashley Road South Employment Area)*

6.2.14 The site allocation seeks to create an employment-led mixed-use quarter north of a new District Centre, creation of a new east-west route linking Down Lane Park and Hale Village, and enhanced Ashley Road public realm. Residential use will be permitted to cross subsidise improvements to employment stock.

6.2.15 The commentary states that this area has the potential to become a mixed-use precinct to the north of the new Tottenham Hale District Centre. New development should complement the range of business uses already operating from Berol House and create new commercial floorspace for knowledge-based firms to operate from.

6.2.16 The introduction of a tertiary education provider linked to the IT sector is a key intervention that the Council is looking at bringing into this area. This site will also form one edge of an east-west route linking Down Lane Park and Tottenham Hale Station.

6.2.17 The TH6 site requirements are as follows:

- The site is within a Designated Employment Area: Regeneration Area and proposals for mixed-use employment-led development will be supported,

where appropriate. It is anticipated that the redevelopment of this site will not create a net reduction in employment floorspace.

- The introduction of a tertiary education provider providing education in the technology sector will be supported on this site.
- Residential development will only be acceptable for the purpose of making viable the re-provision of employment floorspace.
- The proximity of the new Harris Academy to the north and Down Lane Park to the north and west make the area particularly suitable for larger units along those edges.
- Ashley Road will form the key public and movement spine, with pedestrian access to Tottenham Hale District Centre from enhanced workspaces optimised.
- Active frontages will be expected on both sides of the Ashley Road frontage at ground floor level.
- Good quality buildings, including, but not limited to Berol House and 16 Ashley Rd should be retained and adapted for flexible, and affordable employment use. Further employment will be supported, with cross subsidization from residential.
- The site has a key role to play in laying out the Green Grid. Along the southern edge of the site and east-west link will be provided to connect into Down Lane Park to the west and to the Lee Valley in the west. Developments should positively benefit this route by providing active frontages along its length.
- The delivery of superfast broadband to the employment area will be supported.

#### 6.2.18 The Development Guidelines are as follows:

- The most suitable use on the Watermead Way frontage is considered to be employment use, which may include an educational use.
- Development should utilise and improve the amenity and respect the character of Down Lane Park with a street edging the park, with buildings providing an edge to that street and fronting the park to the west and north-west.
- This site forms a transition site between the generally denser District Centre, and the surrounding residential environment.
- The existing industrial character on Ashley Road should be maintained and enhanced, encouraging new businesses to come into the area.
- Ashley Road itself should be pedestrian and cycle friendly and provide a legible route to the new District Centre to the south. Measures to improve the activity onto Ashley Road will be supported on this site, including the orientation of sites to open onto Ashley Road with frequent front doors.
- Additional permeability should be provided through the addition of pedestrian and local access routes passing east-west through the site.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of

and improvement to local air quality and noise pollution should be made on this site.

- Parking should be minimised on this site due to the excellent local public transport connections.
- This site is identified as being in an area with potential for being part of a Decentralised Energy (DE) network. Development proposals should be designed for connection to a DE network and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.
- This site is in an area of flood risk, and a Flood Risk Assessment should accompany any planning application.

#### *Tottenham Hale District Centre Framework (DCF) 2015*

6.2.19 The District Centre Framework acted as an evidence base to inform the TAAP to allow for the implementation of proposals for the Tottenham Hale District Centre. The framework helped to form the strategy for development within the Tottenham Hale District.

6.2.20 The DCF Section 4.1.1 (Building Height and Tall Buildings) identifies the site as suitable for medium rise buildings. Section 4.5.1 (Ashley Road South) identifies the TH6 site as being suitable for mixed-use schemes of high-density businesses and homes occupying converted and new purpose-built accommodation.

#### Policy background summary

6.2.21 National, regional and Local Planning policy is supportive of new residential and employment development which optimises delivery and makes the best use of land. Policy supports the provision of higher density development within this location given the site designations for growth, opportunity area allocation, tall building growth area and proximity to public transport, provision of employment, and other supporting infrastructure to provide suitable development to meet the housing and employment demands of the Borough.

### **6.3 Policy Assessment**

#### Principle of residential use

6.3.1 Policy GG4 (Delivering the Homes Londoners Need) of the London Plan, Policy DM10 of the DPD, and policy AAP3 of the TAAP encourage the delivery of new homes. Policy GG4 supports the need to optimise the delivery of housing delivery on suitable and available brownfield land, such as the site.

6.3.2 London Plan policy GG4 requires the creation of new mixed and inclusive communities with good quality homes and high standards of design to meet

varying needs. The proposal would provide homes in the form of BtR homes including studios, 1-beds, 2-beds, and 3-beds.

*London Plan Policy H11 (Build to Rent)*

- 6.3.3 Policy H11 (Build to Rent) of the London Plan supports BtR development. The main components of the housing stock emerging in Tottenham Hale are conventional private sale, low-cost rent, and intermediate homes. These constitute c.87% of the 3,417 homes granted in Tottenham Hale during recent years.
- 6.3.4 BtR accommodation (and accompanying DMR homes) is approx.8% of the approved homes and the remaining 5% is for student accommodation within the area. Consequently, the introduction of c. 210 additional BtR homes would complement and balance the established and emerging housing stock in Tottenham Hale.
- 6.3.5 The site is part of a wider site allocation promoting mixed use redevelopment including employment generating workspace and housing. The proposed housing component is supported by the site allocation and would contribute meaningfully towards pressing strategic and local need. The principle of delivering new homes at the site and the delivery of BtR housing on the site are supported by the development plan.

*College site (2 Berol Yard)*

- 6.3.6 The college building and educational use/floorspace on the 2 Berol Yard part of the site has planning permission under HGY/2017/2044 but has not come forward. Ada, the National College for Digital Skills (NCDS) was unable to fund or deliver the building and could not fulfil the contract with the applicant to provide the facility.
- 6.3.7 The applicant has undertaken a marketing exercise in an attempt to identify an alternative occupant and operator for the approved building. The report has been submitted alongside the application and confirms there was limited interest despite marketing the building for 32 months and targeting 650 central London agents, delivering two presentations, and extending the marketing to ten life science providers.
- 6.3.8 The report indicates that in total there were 25 end users who engaged in the exercise and whilst they considered it a positive scheme, they did not consider the location to be their preferred choice as it does not have the amenities for students and users did not foresee future demand in this location.
- 6.3.9 The life science operators confirmed they prefer to cluster in Cambridge or Kings Cross and prefer to target existing buildings. Further, the bespoke nature of the college was not considered suitable for end uses who considered it would be too costly to deliver.

- 6.3.10 The report concludes there is limited appeal in the market for an educational use at this location and it poses a high risk being built out as an educational facility. Therefore, there is little prospect of the NCDS, or an alternative college facility being delivered at the site. Consequently, a more appropriate alternative use is sought for 2 Berol Yard.
- 6.3.11 The college building has not been developed and is not in established use as an education or community facility. Consequently, policies which protect against the loss of community and education facilities are not directly relevant to this proposal - including Policy S3 (Education and Childcare Facilities) of the London Plan 2021 and Policy DM49 of the DPD.
- 6.3.12 Whilst the college facility could have played an important role in the ARSM and in the regeneration of Tottenham Hale more generally as a destination and a generator of activity & vibrancy in the District Centre, the proposal would deliver the restoration/extension of Berol House, create activity and permeability at ground level, and introduce a landmark mixed-use building at 2 Berol Yard. As such, many of the benefits of the extant permission would still be realised.
- 6.3.13 Given that there is no demonstrable likelihood of an educational facility being delivered on the site, the proposed residential development is considered to be acceptable for the purpose of making viable the re-provision of employment floorspace. The proposed residential development allows for Berol House (and its industrial character) to be retained, extended & enhanced, and adapted for a significant quantum of flexible employment use.
- 6.3.14 The proposal would also introduce active frontages on Ashley Road, within, and around the site and would ensure that it plays a key role in laying out the Green Grid and increasing west-east permeability. A west-east link would be provided at the southern edge of the site alongside Berol House and through the 6-storey block which would provide the access to the potential future bridge. This would deliver on the aims and objectives of TH6

*Policy DM38: Local Employment Area – Regeneration Areas*

- 6.3.15 Whilst the scheme would have more residential floorspace than employment, Berol House would be at the heart of the scheme and the changes from the previous permission would maximise the employment floorspace within that building – with more E Use Class floorspace as opposed to residential units as permitted under HGY/2017/2044.
- 6.3.16 The previous permission included the following uses and floorspaces Class E 4,100 sqm and Education use 7275 sqm. The new application includes 867 sqm of Class E in 2 Berol Yard and 5492 sqm in Berol House which would be a total of 6,359 sqm.

- 6.3.17 Overall in terms of commercial floorspace there would be an additional 2,259sqm of floorspace. The allocation sought to deliver 15,300sqm across whole masterplan. There is a provision of 12,176sqm of commercial floorspace already permitted/delivered. When the proposed commercial floorspace from the new scheme is added, this increases to 18,535sqm. Whilst this is an approximate calculation, it is anticipated that the redevelopment of this site would provide a net increase in employment floorspace.
- 6.3.18 Furthermore, the additional quality of the commercial floorspace proposed in comparison to the extant scheme must be acknowledged, as well as the fact that the new scheme would result in additional employment.
- 6.3.19 Given the marketing exercise carried out by the applicant it is clear that an educational use is highly unlikely to come forward on the site. As such, the current proposals are considered to maximise the amount of employment floorspace given this context and current viability considerations.
- 6.3.20 The proposals would also deliver high quality flexible space and provide demonstrable improvements in the site's suitability for continued employment and business use through the activation across the ground floor, increase in permeability and enhancement of the public realm including the creation of the public square.
- 6.3.21 The proposals would complement and enhance the continued employment function of the site, the ARSM, and nearby employment sites within the District Centre, it would add a space with a small square and commercial uses that does not currently exist within or near to the District Centre.

*Masterplanning*

- 6.3.22 Policy DM55 of the DM DPD and policy AAP1 require that where developments form only a part of allocated sites, a masterplan shall be prepared to demonstrate that the delivery of the site allocation and its wider area objectives would not be frustrated by the proposal.
- 6.3.23 The remainder of the site allocation has been masterplanned with permissions having been granted for all parts of the site.
- 6.3.24 The applicant has shown how the proposal has evolved the previous master plan and would complement the newly constructed development and enhance this part of the site allocation and support the delivery of its aims and objectives.

*Commercial and District Centre Uses*

- 6.3.25 The site is partially located within the Tottenham Hale District Centre. Local policies AAP4, DM41 & DM45 as well as London Plan Policies SD6, SD7, SD8 and SD9 support mixed use development in town centres.

6.3.26 Additionally, London Plan Policies E1 and E2 support new office provision and mixed-use development, with the focus on identified geographic areas and town centres; and states that new offices should consider the need for a range of suitable workspace, including lower cost and affordable workspace.

6.3.27 TH6 envisaged the wider site for an employment-led mixed-use quarter north of the District Centre, with capacity for 444 homes and 15,300sqm of commercial floorspace. Approximately 6,500sqm of non-residential floorspace has been constructed, or has been granted, as part of the other schemes permitted within the allocation.

6.3.28 Ground level non-residential uses would provide enhanced activation to the public realm. The increase in non-residential uses in Berol House would contribute to the site allocation aim of a mixed-use quarter. The proposals would deliver significant qualitative improvement in the commercial space on the site, replacing low grade accommodation with high quality units designed to appeal to a range of prospective end users.

6.3.29 As part of previous permissions in the masterplan area Commercial and Retail strategies have been sought through the s106 legal agreement to identify how the proposed uses would complement and enhance the commercial offer in Tottenham Hale, considering the wider regeneration. This is again sought under this application.

6.3.30 A relocation strategy is also sought through the s106 for the existing businesses in Berol House to ensure that all is done to support them in finding alternative accommodation.

#### *Additional Affordable Workspace*

6.3.31 The Berol House part of the development makes a significant contribution to the employment aspect of the scheme and the realisation of the aims and objectives of the site allocation. A restriction that would prevent the occupation of 2 Berol Yard until Berol House is completed would not be possible due to existing leasing arrangements in Berol House which means works cannot come forward until these have lapsed.

6.3.32 The applicant acknowledges the importance of 2 Berol Yard, but existing lease arrangements limit their ability to implement immediately and therefore they have committed to providing additional affordable workspace within the proposed 2 Berol Yard building (Retail Unit 2 - 221sqm) in the event construction of Berol House has not commenced by the earlier of A) June 2028, or; B) Practical Completion of 2 Berol Yard. June 2028 follows the end of the existing leases in Berol House.

6.3.33 If the Additional Affordable Workspace is triggered, then it would be subject to a discount of 20% of the prevailing market rent until the later of: A) 3 years from the

date of Practical Completion of 2 Berol Yard or B) The date of Practical Completion of Berol House. This obligation would encourage the delivery of Berol House and provide a public benefit should it not come forward at the earliest feasible opportunity.

*Policy assessment summary*

- 6.3.34 Delivery of a mixed-use scheme including 210 homes is supported given the unlikelihood of the previously permitted educational facility being delivered. The scheme would provide a significant quantum of Class E floorspace in a refurbished and extended Berol House and at ground floor level in 2 Berol Yard with enhanced activation and permeability throughout the site.
- 6.3.35 Whilst the college would have brought benefits, this scheme would provide significant employment floorspace of a high quality as well as new public realm to complete the Ashley Road South Masterplan.
- 6.3.36 Whilst occupation restrictions cannot be put on 2 Berol Yard due to existing lease arrangements, the applicant has committed to providing additional affordable workspace should Berol House not come forward at the earliest opportunity. This would compensate for any delay.

**6.4 Housing, Affordable housing and Policy H11 (Build to Rent)**

- 6.4.1 The Council expects affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD (40% affordable housing provision), with the exception of the affordable tenure split (DM13 A(b)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation.
- 6.4.2 London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%.
- 6.4.3 London Plan Policy H5 outlines that schemes can follow the ‘fast track’ viability route and are not required to submit viability information nor be subject to a late-stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; and meet other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor.
- 6.4.4 London Plan Policy H11 and the Mayor’s Affordable Housing and Viability SPG recognises the contribution of Build to Rent in addressing housing needs and increasing housing delivery, and establish a set of requirements for this tenure,

which would need to be secured in the section 106 agreement for any permission, including:

- The homes must be held under a covenant for at least 15 years (apart from affordable units, which must be secured in perpetuity);
- A clawback mechanism must be put in place to ensure that there is no financial incentive to break the covenant;
- The units must be self-contained and let separately;
- There must be unified ownership and management of the private and affordable elements of the scheme;
- Longer tenancies (three years or more) must be available to all tenants with break clauses for tenants;
- Rent and service charge certainty for the tenancy period on a basis made clear before the tenancy agreement is signed including any annual increases, which should be formula-linked;
- On-site management;
- Providers must have a complaints procedure in place and be a member of a recognised ombudsman scheme; and
- Providers must not charge up-front fees of any kind to tenants or prospective tenants outside of deposits and rent-in-advance.

6.4.5 London Plan Policy H11 states that where a Build to Rent development meets these criteria, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.

6.4.6 To follow the fast-track viability route, Build to Rent schemes must deliver at least 35% affordable housing, and the Mayor expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent, with the remaining 70% at a range of genuinely affordable rents. Schemes must also meet all the other requirements of Policy H5. Further guidance is provided in the Affordable Housing and Viability SPG.

6.4.7 35% Discount Market Rent (DMR) affordable housing (by habitable room) is proposed. A total of 60 2-bed and 3-bed affordable homes would be provided. This would result in 202 affordable habitable rooms. 33% of the total two bed homes would be affordable and 78.6% of the total three bed homes would be affordable.

6.4.8 30% of the 35% total affordable housing provision would be provided at London Living Rent (LLR). The remainder would be provided at a discount to market rent with 2-beds let at 75% of market rent, and 3-beds let at 65% of market rent. There would be twenty-six 2-beds let at 75% of market rent and sixteen 3-beds let at 65% of market rent. The LLR element would include twelve 2-beds and six 3-beds.

- 6.4.9 The proposals would therefore comply with the London Plan and would be considered to be Fast Track eligible. Qualification for fast track is subject to the other caveats being met including securing the affordability, and other requirements listed under Policy H11, these can be secured through the s106.
- 6.4.10 The 60 affordable homes would make a significant contribution to the delivery of intermediate affordable housing including family homes. The applicant has also committed to prioritise families in lettings. This meets the TAAP objective of addressing high levels of population churn by providing more family housing and long leases will be provided giving stability to tenants not available in the wider rental market.
- 6.4.11 The applicant has committed to a dedicated 6-month marketing priority period for local Haringey Residents for the affordable units which shall be completed 12 to 6 months prior to Practical Completion with evidence of the marketing provided to the Council.
- 6.4.12 The applicant has made a commitment to prioritise households with children for the two- and three-bed DMR units, and to ringfence two- and three-bed LLR units for households with children. The affordable homes would be let in accordance with the Council's Intermediate Housing Policy (as amended). This would be secured through the s106, and evidence of the chosen tenants shall be provided to show compliance.

*Housing, Affordable housing, & BtR summary*

- 6.4.13 The proposal would deliver 210 homes as part of a mixed-use scheme. It would provide a London Plan compliant level of affordable housing which would include intermediate homes that would be marketed to Haringey residents with priority given to families. The proposal would provide significant public benefits in terms of housing.

**6.5 Impact on the amenity of adjoining occupiers**

- 6.5.1 London Plan Policy D6 outlines that design must not be detrimental to the amenity of surrounding housing, and states that proposals should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context, while also minimising overshadowing. London Plan Policy D14 requires development proposals to reduce, manage and mitigate noise impacts.
- 6.5.2 Policy DM1 of the DM DPD states that development proposals must ensure a high standard of privacy and amenity for a development's users and neighbours. Specifically, proposals are required to provide appropriate sunlight, daylight and aspects to adjacent buildings and land, and to provide an appropriate amount of privacy to neighbouring properties to avoid material levels of overlooking and loss of privacy and detriment to amenity of neighbouring resident.

- 6.5.3 The Council will support proposals that provide appropriate sunlight, daylight, and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land to provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development.
- 6.5.4 All layouts have been designed to ensure that intervisibility between the proposed homes and neighbouring dwellings in adjacent buildings are minimised to provide privacy. There is approximately 12 metre separation distance to the closest point to the Gessner building which is considered acceptable on the basis that any north facing openings are secondary windows to living spaces and those facing the north-east are angled away, increasing the distance as the elevation runs southeast.
- 6.5.5 Overlooking and views between the proposal and Ashley Road East/1 Ashley Road would be commensurate with the context, with only a portion of the 6-storey building facing the building and the distances between the buildings largely reflecting those of the existing permission with similar distances. The taller tower would be angled in a way so as to make views oblique and minimise mutual overlooking.

*Noise and vibration*

- 6.5.6 Conditions are attached which would ensure noise and vibration would be mitigated so that neighbouring properties would not be unduly impacted by the proposals in this regard.

*Daylight and sunlight*

- 6.5.7 A daylight and sunlight assessment has been undertaken for the proposed development in accordance with the guidelines set out in the BRE Report (Second Edition).
- 6.5.8 There are some impacts from the proposal on existing neighbouring buildings, those under construction, and those with planning permission but not yet started. Many of these impacts must be assessed in the context of this site being currently undeveloped, so the neighbours achieve a much higher level of daylight than would reasonably be expected, although assessment comparing this proposal to the day and sunlight effect of the previously approved college shows that there is still a noticeable loss in many cases, albeit much reduced from the current undeveloped situation.
- 6.5.9 Whilst the closest developments The Gessner and Ashley Road East/1 Ashley Road have residents, it should also be noted that many of the other neighbours assessed are not yet inhabited, being under construction or merely planned, so residents would never experience the better day and sunlight levels without this development, or not for very long.

- 6.5.10 The Mayor of London's Housing SPG acknowledges that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London.
- 6.5.11 In particular, the 27% VSC recommended guideline is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.
- 6.5.12 Overall, the effects of the proposed development on the neighbouring properties are in line with area expectations. Whilst some localised transgressions do occur it can be seen that they are predominantly driven by the limitations placed by the use of projecting and recessed balconies on the neighbouring buildings tested and by the comparison with the values achieved with the site undeveloped.
- 6.5.13 Review of the assessments undertaken with the extant scheme in place shows that the proposed development would have a limited additional impact and that the properties would maintain appropriate daylight. So whilst there would be additional harm from the proposal, the degree of harm would be limited over the extant scheme and would result in outcomes that are to be expected in a context such as this.
- 6.5.14 Amenity impacts must be considered in the overall planning balance, with any harm weighed against expected benefit. There would be some adverse impacts on amenity, as outlined above. However, officers consider that the level of amenity that would continue to be enjoyed by neighbouring residents is acceptable, given the benefits that the proposed scheme would deliver.

## **6.6 Design and tall building assessment**

- 6.6.1 The NPPF (July 2021) makes beauty and placemaking a strategic national policy, includes an expectation that new streets are tree-lined and places an emphasis on granting permission for well-designed development and for refusing it for poor quality schemes, especially where it fails to reflect local design policies and government guidance contained in the National Design Guide (January 2021) and, where relevant, National Model Design Code (July 2021).
- 6.6.2 London Plan Policy D4 encourages the use of masterplans and design codes and 3D virtual modelling and thorough scrutiny by officers and the design review process to help ensure high quality development (particularly, as in this case, the proposed development would include a tall building).

- 6.6.3 Local Plan Strategic Policy SP11, and Policies DM1 and DM6. Local Plan Policy DM1 states that all development must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. Further, developments should respect their surroundings by being sympathetic to the prevailing form, scale, materials, and architectural detailing.
- 6.6.4 Local Plan Policy SP11 states that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe, and easy to use.
- 6.6.5 SP11 goes on to say applications for tall buildings will be assessed against the following criteria (summarised): adopted Area Action Plan (AAP) or masterplan framework, assessment supporting tall buildings in a Characterisation Study compliance with DM policies and all the relevant recommendations in the CABE / English Heritage "Guidance on Tall Buildings" 2007 (since superseded in 2015 and 2022).
- 6.6.6 DM6 part C sets out detailed policy requirements for tall buildings; being in an area identified as suitable, represent a landmark by which its distinctiveness acts as a wayfinder or marker, is elegant and well proportioned, visually interesting when viewed from any direction, positively engage with the street environment, consider impact on ecology and microclimate, going onto requiring where tall buildings are in close proximity to each other they avoid a canyon effect, consider their cumulative impact, avoid coalescence and collectively contribute to the vision and strategic objectives for their area.
- 6.6.7 London Plan Policy D9 requires that tall buildings are only developed in locations that are identified as suitable in Development Plans. It goes on to set out a number of visual, functional, and environmental impacts of tall buildings that should be considered in planning decisions.
- 6.6.8 The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres. Strategic Policy SP11 requires all new development to 'enhance and enrich Haringey's built environment and create places and buildings of high quality'. Policy AAP6 states that, in line with DM6, Tottenham Hale and North Tottenham as growth areas have been identified as being potentially suitable for the delivery of tall buildings.

*Quality Review Panel (QRP)*

- 6.6.9 The scheme has been presented to Haringey's Quality Review Panel on the 13 July 2022, 19 October 2022, and 01 March 2023. The written findings of the panel can be found within Appendices 6, 7, and 8.
- 6.6.10 The full QRP Report of the latest review on 01 March 2023 is attached at Appendix 8. The Report's summary is as follows:

*The proposals for Berol Quarter have been through a number of iterations and have now developed into a scheme that the panel warmly supports. Berol House sensitively safeguards the character of the area and animates the public realm. This review focused on 2 Berol Yard, which the panel is now convinced will contribute to a successful new neighbourhood.*

*The panel’s initial concerns about the appropriateness of the tower’s scale in this context have been addressed by creating a skilful relationship with the emerging surrounding buildings, and by the quality of residential accommodation. However, the bridge over Watermead Way, not only the landing, should be delivered to justify the height of this proposal in terms of public benefit. The bridge should be formally tied in with this scheme through a Section 106 agreement. The design of the bridge landing is developing well. Input from an accessibility expert should be sought to determine the best arrangement of the lift and stair. A channel for bicycles should be incorporated into the stairs, and two lifts could be provided to take pressure off the lift.*

*More mature trees with larger canopies should be included in the landscape design and enough space should be allowed for events. The panel enjoys the historical references used in the seating designs. These could also work as play structures. They should be made from robust, high-quality materials, and offer a good opportunity for co-design with local artists and the community. All private and shared rooftop amenity spaces should be analysed to ensure they are usable in windy conditions. The internal layout of the cores is working well. The panel commends the integration of sustainability considerations into the design, especially through solar shading. Overheating should be tested against extreme summer temperatures. The materials palette is promising. The revisions to the residential entrance experience are also positive improvements.*

6.6.11 A summary of the QRP concerns and responses are listed below:

QRP Comment	Officer Response
<p>The bridge over Watermead Way, not only the landing, should be delivered to justify the height of this proposal in terms of public benefit. The bridge should be formally tied in with this scheme through a Section 106 agreement.</p>	<p>The developer is contributing to the bridge through the development of the bridgehead, landing platform and access routes within their building which would be secured in the s106.</p> <p>The bridge over Watermead Way would be delivered at a later point through other means. The proposed contribution is proportionate and fair given CIL payments and given the contributions of other developments nearby.</p>

	The height of the scheme is justified by its exemplary architecture and its role in marking the Green Link and the station.
Input from an accessibility expert shall be sought to determine the best arrangement of the lift and stair and a channel for bicycles should be incorporated into the stairs.	This is secured in the s106.
More mature trees with larger canopies should be included in the landscape design and enough space should be allowed for events.	A landscaping condition is recommended that would require submission of these details. An external space within the Berol Square, of not less than 5m x 5m shall be provided which shall be available for not less than 3 months of each year for a temporary public art installation, to showcase Tottenham talent
All private and shared rooftop amenity spaces should be analysed to ensure they are usable in windy conditions	The wind assessment submitted alongside the application has been independently peer reviewed and found to be sound. Conditions are recommended to ensure ongoing compliance and mitigate against any undue impacts.
Overheating should be tested against extreme summer temperatures.	Conditions are recommended that seek a revised Overheating report that would ensure overheating risk is minimised and any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.

*Building Scale, Form and Massing*

6.6.12 London Plan Policy D3 states that development proposals should provide active frontages and positive relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest. They should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to buildings.

6.6.13 The existing footprint of Berol House would largely remain unchanged whilst 2 Berol Yard would form a roughly square shape building to the east. This would allow for the creation of the new public space, Berol Square. The new position of Berol Square (compared to that permitted under HGY/2017/2044) allows for the square to be activated by retail frontages and to become a destination point.

- 6.6.14 The southern footprint of the building, which projects out with a 6-storey element, has been intentionally designed to provide a more comfortable enclosed square and to draw people up into the 6-storey building into the landing platform and the potential future bridge.
- 6.6.15 The GLA Officer initially raised concerns about the projection filling the Green Link. However, they subsequently commented, following sight of the latest QRP comments, that they are now generally satisfied that the urban design considerations in relation to height, massing, and separation distances are appropriately resolved.
- 6.6.16 London Plan Policy D9 (A) calls on development plans to define what is considered a tall building for specific localities, based on local context (although this should not be less than 6-storeys or 18 metres above ground to the floor level of the uppermost storey).
- 6.6.17 The Local Plan (Strategic Policies 2013-2026) included a borough-wide definition of 'tall building' as being those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10-storeys and over (or otherwise larger than the threshold sizes set for referral to the Mayor of London).
- 6.6.18 The strategic requirement of London Plan Policy D9 (Part B) is for a plan-led approach to be taken for the development of tall buildings by boroughs and makes clear that tall buildings should only be developed in locations that are identified in development plans. The Upper Lee Valley Opportunity Area Framework proposes that future tall buildings will generally be in well-defined clusters in identified urban growth centres.
- 6.6.19 London Plan Policy D9 (Part C) sets out a comprehensive set of criteria for assessing the impacts of proposed tall buildings and these are discussed in detail below. Part D calls for free publicly accessible areas to be incorporated into tall buildings where appropriate, but officers do not consider it appropriate for residential towers.
- 6.6.20 Strategic Policy SP11 requires all new development to enhance and enrich Haringey's built environment and create places and buildings of high quality. It makes clear that applications for tall buildings will be assessed against a number of criteria, including the following: an adopted Area Action Plan or masterplan framework for a site (i.e. the Tottenham Area Action Plan and the ARSM); assessment supporting tall buildings in a Characterisation Study; compliance with the Development Management Policies; and compliance with all relevant recommendations as set out in the CABE/English Heritage "Guidance on Tall Buildings" (2007 since superseded in 2015 and 2022).

6.6.21 Policy DM6 provides further criteria for the design of tall buildings, including to conserve and enhance the significance of heritage assets, their setting and the wider historic environment that would be sensitive to taller buildings.

6.6.22 The policy also seeks to protect and preserve existing locally important and London-wide strategy views in accordance with Policy DM5 (with Figure 2.1 confirming that the site does not directly interact with any locally significant views and vistas). An urban design analysis is required to be submitted with applications for tall buildings assessing the proposal in relation to the surrounding context.

6.6.23 Policy AAP6 states that, in line with Policy DM6 (Figure 2.2), the Tottenham Hale Growth Area has been identified as being potentially suitable for the delivery of tall buildings.

*Proposed Tall Building*

6.6.24 Given that London Plan Policy D9 is the most up-to-date development plan policy on tall buildings and includes the most comprehensive set of impact criteria and covers nearly all the criteria covered in Haringey's own tall buildings policies, this has been used as a basis of an assessment. It incorporates most of the relevant criteria set out in Local Plan Policy DM6, although specific criteria from this policy are also addressed below.

6.6.25 Location - As stated above, there is clear and specific policy support for the principle of tall buildings in the Tottenham Hale Growth Area albeit the DCF Section 4.1.1 (Building Height and Tall Buildings) identifies the site as suitable for medium rise buildings.

6.6.26 Visual impacts – Part C (1) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn.

*(a) (i) long-range views – the top of proposed tall buildings should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views.*

*(a) (ii) mid-range views - the form and proportions of tall buildings should make a positive contribution to the local townscape in terms of legibility, proportions and materiality.*

The development forms part of an emerging cluster of tall buildings, including taller buildings that are already permitted, under construction, or completed around Tottenham Hale. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development.

Given the number of other tall buildings already approved (including some now built) in the cluster immediately around this site, there would be few locations where this proposal would be visible, but the other currently approved tall buildings would not be.

A number of close and distant views of the proposals have been produced, in each case including a version at the time of assessment and with the “cumulative impact” from other approved but unbuilt or unfinished buildings collaged in.

The applicants most recent and accurate views demonstrate that the proposal would sit within the cluster of built, under construction and planned tall buildings marking the centre of Tottenham Hale. It would not stand out but would sit assertively as one of the tallest buildings around the station square, also marking the green link and potential future bridge.

As such it would contribute appropriately to the legibility and distinctiveness of this important emerging centre and help make the cluster attractive and appealing in longer, medium, and local views.

*(a) (iii) immediate views from the surrounding streets – the base of tall buildings should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.*

The application scheme would relate well with adjacent buildings within the ARSM and adjacent sites. The ground floor would be activated and support activity on the accompanying public realm. The staggered heights of the blocks would support a sympathetic transition in scale, with the taller blocks sited adjacent to Watermead Way.

*(b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.*

The main justification for the significant height increase is in landmark creation for wayfinding, re-analysis of the tall building cluster, and the quality of architectural and landscape design. The tall building would be embedded within a podium and shoulder blocks, tying them into the wider grain and street pattern, and mitigating their scale, wind, daylight, and sunlight effects.

The 32-storey tower at 2 Berol Yard would relate to Related Argent’s tallest building (yet to be constructed) and Hale Works as a triangle of well-spaced tall buildings, straddling and pinpointing the station, with its shoulder elements relating to the medium-tall neighbours and lower shoulder to Berol House, the mansion blocks to the west and lower elements of neighbouring buildings.

It would be capable of being considered a “Landmark” by being a wayfinder or marker for the west-east Green Link, location of the potential future bridge, and the heart of the new town centre.

It would also be capable of being considered a “Landmark” by being elegant, well-proportioned, and visually interesting when viewed from any direction, by virtue of its “clustered” design of distinct angled fragments. The different fragments are designed to relate to their different context; lower ones to immediate neighbours, with matching brick colours and angles of façade, whilst taller fragments relate more to their longer views to the marshes and to central London;

*(c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.*

The materiality of 2 Berol Yard responds to the different fragments and their differing relationships. Brick colours relate to the buildings they face, whilst the tones get lighter as their height increases, so that the lowest block will be a unique dark green brick relating to the Green Link, the second fragment a darker red relating to the Related Argent building opposite it, the third a red-buff relating to Berol House, the fourth a lighter grey-brown relating to The Gessner and the fifth a light pink buff, with the core where it rises above being a darker material uniting the composition.

The fenestration pattern is of orderly, gridded facades of identical rectangular window openings, with the modelling providing interest, but fenestration varies where the columns of larger balcony openings occur and most of all at the top floor with the larger still openings for the communal facilities. The window design may be repetitive, but it is a carefully designed window design, based on the classic “Chicago” window of a larger central pane with two narrower side panes, enlivened by louvres and sun shading relating to function and aspect to avoid overheating and allow flexible opening options to provide good daylight and ventilation levels without being difficult to use.

The overall architectural approach, especially the gridded facades and use of brick, will also match the other new high and lower rise buildings making up this vibrant new District Centre at Tottenham Hale.

Although precise materials and details will be secured by condition, those proposed in the application, would be beautiful, durable, and complementary to the existing and emerging context.

*(d) proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will*

*require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.*

The 2 Berol Yard building would positively contribute to the character of the area. The potential impacts on above ground heritage assets are addressed under Impact on heritage assets including affected conservation areas below. In summary, officers consider that the proposed building, when visible from the built heritage assets in the vicinity of the application site and beyond, would be seen and experienced in the context of the wider regeneration of the area and the cluster of other tall buildings.

*(g) buildings should not cause adverse reflected glare.*

The 2 Berol Yard building has been appropriately designed to respond to its use, the range of internal environments proposed, and the surrounding context. Given the predominately masonry elevations and staggered massing of the proposal, there is unlikely to be adverse reflected glare.

*(h) buildings should be designed to minimise light pollution from internal and external lighting.*

There are no proposals to externally illuminate the proposed tall buildings and officers do not consider that there would be any significant adverse effects from internal lighting for this site given the emerging form of development in the area.

6.6.27 Functional impacts – Part C (2) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

- *(a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants.*

Fire safety is addressed below and is considered acceptable subject conditions.

- *(b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process.*

The London Plan (supporting text 3.4.9 for Policy D4) stresses the importance of these issues for higher density developments. Vehicular servicing is discussed under Transportation, parking, and highway safety below and is considered acceptable subject to a Delivery and Servicing Plan (which is recommended by planning condition).

- *(c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas.*

The proposed buildings would be accessed from generously sized entrances from Ashley Road and from within the site from Berol Walk and Berol Square/Green Link, which is considered acceptable. The proposed entrances are prominent and legible, which is welcomed. The retail and commercial ground floor uses would activate the adjacent public spaces.

- *(d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building.*

The capacity of the transport network is addressed under Transportation, parking, and highway safety below. In summary, this is considered to be acceptable.

- *(e) jobs, services, facilities, and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and maximises the role of the development as a catalyst for further change in the area.*

The proposed ground floor commercial units and associated economic activity/job opportunities would make a positive contribution towards the regeneration of the area, as would the occupants who would use local shops and services.

- *(f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.*

The site is not within an 'aerodrome safeguarding' zone and subject to the inclusion of aircraft warning lights (on construction cranes and completed buildings) required by regulations, the proposed tall buildings are considered acceptable.

Proposed roof-top PV arrays are addressed under Energy, Climate Change & Sustainability below and are considered acceptable (there are no existing PV arrays on buildings in the area that would be adversely affected).

6.6.28 Environmental impacts – Part C (3) of London Plan Policy D9 sets out the following relevant criteria that are addressed in turn:

- *(a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building.*

In summary, subject to conditions ensuring that all necessary wind mitigation measures are incorporated into the proposed scheme beyond those incorporated into the design itself; and that landscaping is managed and maintained, no likely significant residual wind effects are predicted and the likely resultant wind environment for future residents is considered acceptable.

Wind is addressed in full under the Wind and Microclimate section below.

Daylight and sunlight impacts on neighbouring properties is assessed under the *impact on the amenity of adjoining occupiers* section; and temperature conditions are assessed under *Energy, Climate Change and Sustainability*.

- *(b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.*

Potential air quality impacts are addressed under Air Quality below and are considered to be acceptable.

- *(c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.*

Potential noise and vibration impacts on future occupants are addressed under *Quality of Residential Accommodation* below, with the affect on neighbours assessed under *impact on the amenity of adjoining occupiers* above and are considered to be acceptable, subject to approval of details (which is to be reserved by a recommended planning condition).

6.6.29 Cumulative impacts – Part C (4) of London Plan Policy D9 requires the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area to be considered when assessing tall building proposals.

6.6.30 The Townscape and Visual Impact Assessment (TVIA) takes account of subsequent permissions and the application scheme. The study area for the assessment of townscape effects has been set at a 2-kilometre (km) radius from the application site and assesses impacts on 5 Townscape Character Areas surrounding the site.

6.6.31 The purpose of the assessment is to identify an area across which the proposed development would likely impact and effect the townscape and people's views. The proposed study area is considered to be proportionate to the proposed

development and whilst it may be perceived beyond the study area, it is assessed that it would not result in townscape or visual effects, due to the combination of distance and intervening features.

6.6.32 As outlined above, London Plan Policy D9 identifies most of the relevant criteria in Local Plan Policy DM6. However, a number of specific Local Plan criteria are addressed below:

- *Policy DM6 (D) (a) requires tall buildings within close proximity to each other to avoid a canyon effect and Policy DM6 (D) (c) requires tall buildings to avoid coalescence between individual buildings.*

The proposed 2 Berol Yard building, because of its fragmented form, would avoid creating a canyon effect. The tallest elements of 2 Berol Yard would be angled away from neighbouring buildings. There is also a focus on streets and public spaces within the site with the formation of Berol Walk and the 6-storey building within the Green Link.

The podium addresses the street, and the gaps create comfortable relationships and defined streets that would prevent a feeling of enclosure or a canyon effect. The distances between buildings are similar to the distances between other buildings in the District Centre and also similar to distances between buildings in other high-density locations across London.

2 Berol Yard is one of a cluster of tall buildings that are meant to be seen together to indicate the location of Tottenham Hale District Centre and mark the west-east Green Link. The variation in form, design, and materiality means that the different buildings can be distinguished. The form and gaps around the building ensures that there is relief between the nearest neighbouring buildings.

- *Policy DM6 (D) (d) requires applications for tall buildings to demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for the area.*

The submitted TVIA and DAS do this, and officers have taken account of these assessment when considering the proposals.

- *Policy DM6 (E) – requires the submission of a digital 3D model to assist assessment.*

This has been submitted and officers have used this to help them consider the proposals.

#### *Townscape and Visual Effects*

6.6.33 London Plan Policies D9 and HC4 make clear that development should not harm Strategic Views, with further detail provided in the Mayor's London View

Management Framework (LVMF) SPG. At the local level, Policy DM5 designates local views and the criteria for development impacting local view corridors.

6.6.34 The Townscape and Visual Impact Assessment (TVIA) considers likely significant townscape and visual effects across the study area. This has also helped inform the assessment of likely significant effects on built heritage, which is addressed below under ‘Impact on heritage assets including affected conservation areas’.

6.6.35 As part of the TVIA, 17 verifiable or representative views have been produced. The site does not fall within any Strategic Views identified in the Mayor’s London View Management Framework (LVMF) or within any Locally Significant Views as identified in Policy DM5.

6.6.36 The assessment has considered the effects on 17 representative views as summarised in Table 6 below. It is representative of the main visual receptors in the surrounding area. It found that there would be views of the proposed development in long views from open spaces on higher ground at Alexandra Palace and Springfield Park, from Markfield Park and from the open areas of wetlands and reservoirs in the Lea Valley. There would also be long views along Bruce Grove.

*Table 6 – Summary of visual effects*

Ref	Location	Sensitivity	Degree of Change	Visual Effect	Cumulative Degree of change	Cumulative visual effect
1	Alexandra Palace	High	Low	Minor Beneficial	Low	Minor Beneficial
2	Bruce Grove/Lordship Lane junction	Low to Medium	Medium	Neutral	Medium	Neutral
3	Bruce Grove	Low to Medium	Very Low	Negligible	Medium	Neutral
4	High Road/Chesnut Road junction	Low to Medium	Medium	Minor to Moderate Beneficial	Medium	Minor to Moderate Beneficial
5	High Road/Monument Way junction	Low to Medium	Low to Medium	Neutral	Low to Medium	Neutral
6	High Road/Broad Lane junction	Low to Medium	Nil (s)/ Low (w)	Neutral	Very Low	Neutral
7	Markfield Park	Low to Medium	Very Low (s)/ Low (w)	Negligible to Minor Beneficial	Medium	Minor to Moderate Beneficial
8	Springfield Park	Medium	Medium	Moderate Beneficial	Medium	Moderate Beneficial
9	East Warwick Reservoir	Medium	Medium	Moderate Beneficial	Medium	Moderate Beneficial
10	Forest Road	Low to Medium	Low	Minor Beneficial	Medium	Minor to Moderate Beneficial
11	Lockwood Reservoir	Medium	Medium	Moderate Beneficial	Medium	Moderate Beneficial
12	Tottenham Marshes	Medium	Medium	Moderate Beneficial	Medium	Moderate Beneficial
13	Down Lane Park	Medium	Medium	Moderate Beneficial	Medium	Moderate Beneficial
14	Chesnut Road towards Park View Road	Low	Medium	Minor Beneficial	Medium	Minor Beneficial
15	Monument Way towards Park View Road	Low	Medium	Minor Beneficial	Medium	Minor Beneficial
16	Tottenham Hale Station entrance	Low	High	Moderate Beneficial	High	Moderate Beneficial
17	Watermead Way	Low	High	Moderate Beneficial	High	Moderate Beneficial

6.6.37 The TVIA states that in long range views the tower of 2 Berol Yard would be seen in conjunction with existing tall buildings at Tottenham Hale. There would

generally be Minor or Moderate Beneficial visual effects as a result of the improvements to the legibility of Tottenham Hale within the wider urban landscape. Along Bruce Grove, there would be Neutral visual effects where taller buildings are characteristic of the wider townscape but where the proposed development would be seen in the context of historic townscape elements in the foreground.

6.6.38 In the long range views the proposals would have an attractive slender profile, distinctive stepping form and varied materials. It would relate well to other tall and mid-rise elements in the townscape and would reinforce the location of Tottenham Hale station, surrounding regeneration area and the potential future pedestrian footbridge. In conjunction with the surrounding cumulative schemes it would create a coherent cluster of tall buildings and a clear focal point in the townscape.

6.6.39 In medium range views from the surrounding urban area, there are views along streets aligned with the proposed development and from urban open spaces such as Down Lane Park. There would be a range of Minor and Moderate Beneficial effects where the introduction of taller buildings would enhance the legibility of the area and Neutral effects where the general character of the view would remain the same. Where seen, the articulation of the built form, definition of the core and high quality of the materials would be clearly seen.

6.6.40 In local views along Watermead Way and from the station, the proposed development would be a positive addition to the frontage to Watermead Way, providing well-proportioned frontages that define the frontage and entrance to the Green Link or Ashley Link. The use of green brickwork on the lower block would further add to the distinctiveness of this element and contribute to local wayfinding.

6.6.41 The summary findings of the submitted TVIA are considered to be accurate. In that it is considered that the visual effects of the proposed development would be acceptable. It would generally be a positive element in the wider urban scene and would not harm the visual amenities of people in the surrounding area.

*Townscape effects – Berol House & 2 Berol Yard*

6.6.42 The TVIA notes that the site includes the historic pencil factory – Berol House – that contributes positively to the local townscape and has Medium sensitivity to change. The proposed development would successfully retain and incorporate the building within a residential-led mixed use scheme. A new connection through the centre would improve the permeability of the existing block and link to a new network of pedestrian routes and attractive areas of public realm.

6.6.43 These would tie into connections to the wider area including the Ashley Link and a potential future pedestrian footbridge. The development would provide active frontages to Ashley Road and high-quality new pedestrian areas with a mix of

retail, community, and commercial uses as well as the entrances to the flats above. The residential and commercial uses would contribute to the vitality of the surrounding public realm. Berol House would be enhanced through sympathetic refurbishment and the roof level extension.

6.6.44 2 Berol Yard has been carefully designed in its form, massing, details, and materials to create a distinctive and high-quality new addition to the townscape that would help to positively define the new streets and spaces. The TVIA has found that the proposed development would have a Major Beneficial effect on the site itself and would retain and enhance a positive townscape receptor.

6.6.45 There would be a range of beneficial changes to the townscape character of the surrounding area. There would be a Moderate Beneficial effect as a result of a range of improvements to the permeability, legibility and public realm of the site and the way it connects to the wider area. The 2 Berol Yard building would help to provide orientation and wayfinding to Tottenham Hale Station as well as marking Ashley Link, Berol Square, and the potential future bridge link.

6.6.46 In combination with existing buildings and consented schemes the proposed development would create a coherent townscape reflecting the mix of uses and accessible location.

#### *Visual effects*

6.6.47 The assessment found that the visual effects of the proposed development would be acceptable. It would generally form a positive addition to the wider urban scene and would not harm the visual amenities of people in the surrounding area.

6.6.48 The proposals would have an attractive slender profile, distinctive stepping form and varied materials. It would relate well to other tall and mid-rise elements in the townscape and would reinforce the location of Tottenham Hale station, surrounding regeneration area and potential future pedestrian footbridge.

6.6.49 In conjunction with the surrounding cumulative schemes it would create a coherent cluster of tall buildings and a clear focal point in the townscape. The nature of change arising from the proposed development in combination with the cumulative schemes would generally be of the same order with only a few locations increasing the extent of development seen.

#### *Inclusive Design*

6.6.50 London Plan Policies GG1, D5 and D8 call for the highest standards of accessible and inclusive design, people focused spaces, barrier-free environment without undue effort, separation, or special treatment.

- 6.6.51 The proposed scheme has been designed to meet inclusive design principles and good practice. All external routes, footway widths, gradients and surfacing would respect the access needs of different people. The proposed amenity spaces are designed to be safe at different times of the year.
- 6.6.52 Building access, internal corridors and vertical access are capable of meeting Building Regulations. Blue badge parking has been incorporated into the scheme and proposed cycle parking includes spaces for 'adaptive' and large bikes/mobility scooters.
- 6.6.53 Overall, officers are satisfied that the proposed scheme would be accessible and inclusive. The particular requirements in relation to wheelchair accessible accommodation is discussed under Quality of Residential Accommodation below.

*Secured by Design*

- 6.6.54 London Plan Policies D1-D3 and D8 stress the importance of designing out crime by optimising the permeability of sites, maximising the provision of active frontages and minimising inactive frontages.
- 6.6.55 The proposed layout incorporates a good front to back relationship and includes active ground floor frontages in the form of commercial units, concierge/reception with front doors on the streets. This should all help ensure a safe and secure development and an active public realm.
- 6.6.56 The detailed design of the public realm, including proposed landscaping and lighting, are also considered acceptable. The proposed roof top private communal amenity spaces have been suitably designed to safeguard safety and security.
- 6.6.57 A condition is recommended which would require Secured by Design accreditation and ensure The Metropolitan Police's Designing Out Crime Officer's (DOCO) continued involvement in detailed design issues.

*Development Design – Summary*

- 6.6.58 The proposed scheme would refurbish and extend a locally listed building in a sensitive way that would put it at the heart of the development and celebrate its industrial heritage. It would also include a well-designed and architecturally interesting tall building that would provide a wayfinding function for the station and the Green Link.
- 6.6.59 The proposal would make significant improvements to the public realm, introducing a new public square and new streets that would activate this part of Tottenham Hale and increase permeability. The proposal would contribute to a potential future bridge and would help realise the aims and objectives of the site allocation with high quality buildings and public spaces.

## 6.7 Impact on heritage assets including affected conservation areas

- 6.7.1 Paragraph 196 of the revised NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.7.2 Policy SP12 of the Local Plan seeks to maintain the status and character of the borough's conservation areas. Policy DM6 continues this approach and requires proposals affecting conservation areas and statutory listed buildings, to preserve or enhance their historic qualities, recognise and respect their character and appearance and protect their special interest.
- 6.7.3 Policy AAP5 speaks to an approach to Heritage Conservation that delivers "well managed change", balancing continuity and the preservation of local distinctiveness and character, with the need for historic environments to be active living spaces, which can respond to the needs of local communities.
- 6.7.4 Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.7.5 The policy further states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions.
- 6.7.6 In relation to listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and in relation to conservation areas, "special attention should be paid to the desirability of preserving or enhancing the character or appearance of that area".
- 6.7.7 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 6.7.8 This application follows previous permissions for tall buildings in the wider area of the application site, including buildings within the Argent Masterplan Area, adjacent to the site. The impact of these buildings on the built historic environment has been assessed as part of the relevant applications.

- 6.7.9 The Conservation Officer notes that the comprehensive townscape visual assessment supporting the application provides a clear understanding of the changing character of The Hale as experienced in the background of views across and out of Alexandra Palace Park, South Tottenham CA and Markfield park.
- 6.7.10 The visual impact views include the cumulative schemes located within Tottenham Hale East as will be seen, among others, in views taken from various viewpoints along the Bruce Grove and Tottenham Green conservation areas along the Tottenham historic corridor.
- 6.7.11 It is evident that there is already an ongoing high degree of change in scale and built form in the background of those views taken across the Tottenham Conservation areas and looking towards the Tottenham Hale station, and the transformation of this area is due to continue.
- 6.7.12 The Conservation notes that the proposed development would only be visible in the far background of the views across and out of the conservation areas and related heritage assets as part of a group of tall new elements of various heights and taller built forms such as the Millstream Tower, will be more prominent than the proposed development in some of these views, and particularly in the winter.
- 6.7.13 In views along Bruce Grove, where taller buildings are already characteristic of the wider townscape, the proposed development would be seen without harm in the context of historic townscape elements in the foreground.
- 6.7.14 In the long range views the new development would have a slender profile, stepping form and varied materials it would create a coherent cluster of tall buildings and a clear focal point in the townscape thus reinforcing the location of Tottenham Hale station.
- 6.7.15 The Conservation Officer notes that the 2 Berol Yard building would signpost, in conjunction with an emerging townscape of taller buildings around Tottenham Hale, the new urban character and spatial hierarchy of the area, where the proposed development would become part of a new, varied skyline that will define Tottenham Hale town centre through a 'wave' skyline profile as envisaged in the council vision for the area.
- 6.7.16 The Conservation Officer concludes that The District Centre has and is experiencing extensive redevelopment, including the construction of tall new buildings, some of which have already been constructed or are in the process of construction.
- 6.7.17 The proposed building, when visible from the built heritage assets in the vicinity of the application site and beyond, would be seen and experienced in the context

of the wider regeneration of the area and the cluster of other tall buildings, some of which are taller than the proposed development.

- 6.7.18 In terms of the proposed refurbishment and three storey roof extension to Berol House, to provide office uses and an external terrace the Conservation Officer notes that this constitutes an opportunity to sustainably retain, enhance and put into beneficial use the locally listed building while carefully reconfiguring it within its emerging new context.
- 6.7.19 The building will be provided with new entrances and new internal route at ground level to improve permeability and will host retail and commercial uses at ground and first floor thus offering a more active frontage to Ashley Road.
- 6.7.20 The Conservation Officer notes that the proposed additional two storeys will be sympathetically clad in terracotta tiles with dark powder coated frames and detailing and will be crowned by a further, setback, top floor with double glazed curtain walling that will positively complement and improve the design of the host building and will sustain its use.
- 6.7.21 The urban regeneration of this area will rest on a careful and integrated reconfiguration of buildings and places, such as the new pedestrian link 'Berol Walk' with trees connecting Berol House and 2 Berol Yard with The Gessner and One Ashley Road, or the new 'Gessner Lane' to the north, or the new public space designed to the south of Berol House and 2 Berol Yard that will host a winter garden until when it will connect in the future to a bridge link across Watermead Way as part of the masterplan aspiration to connect the Lea valley and Tottenham High Road.
- 6.7.22 The Conservation Officer concludes that the proposed scheme will altogether contribute to define the new urban character of the area through both the creation of a tall building on the existing car park backing Berol House and by conserving the built memory of the historic industrial use of the area as exemplified by Berol house.
- 6.7.23 The re-design and extension of Berol House respects and complements the industrial heritage character of the host building while providing distinctive and well-composed improvements to the host building. The new building at 2 Berol Yard building would successfully complement both the existing and emerging context through its articulated elevations, materials and variations in height that would help to break up the scale and form of the building and would frame, together with Berol House, new public spaces, and pedestrian routes.
- 6.7.24 The new public realm would benefit from high quality finishes and hard and soft landscaping. The new frontages and uses proposed to ground floor will provide increased activity and visual interest with an overall positive effect on the

townscape character of the development site and on the setting of the locally listed Berol House.

- 6.7.25 The Legal Position on the impact of heritage assets is as follows. Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provides: "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Among the provisions referred to in subsection (2) are "the planning Acts".
- 6.7.26 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."
- 6.7.27 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) intended that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."
- 6.7.28 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit.
- 6.7.29 If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight.
- 6.7.30 The authority's assessment of likely harm to the setting of a listed building or to a conservation area remains a matter for its own planning judgment but subject to giving such harm the appropriate level of weight and consideration. As the Court of Appeal emphasised in Barnwell, a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.

6.7.31 The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

6.7.32 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and conclude on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

6.7.33 The proposed development would very positively retain the locally listed Berol House, would conserve, and unveil its heritage significance and would improve the urban quality of its setting, without any negative impact on the legibility, primacy, and significance of other heritage assets in the borough, and while delivering much needed improvements to the urban character of its locality.

6.7.34 For the reasons above, it is considered that the proposed development would not have any further impact on the built historic environment given the context within which it would be located. Therefore, the proposed development would not result in any further harm to the significance of the built heritage assets in the borough.

## **6.8 Quality of Residential Accommodation**

6.8.1 London Plan Policy D6 sets out housing quality, space, and amenity standards, with further detail guidance and standards provided in the Mayor's Housing SPG. Strategic Policy SP2 and Policy DM12 reinforce this approach at the local level.

### *Accessible Housing*

6.8.2 London Plan Policy D7 and Local Plan Policy SP2 require that all housing units are built with a minimum of 10% wheelchair accessible housing or be easily adaptable to be wheelchair accessible housing. London Plan Policy D5 requires safe and dignified emergency evacuation facilities, including suitably sized fire evacuation lifts.

6.8.3 The proposal is compliant with the London Plan policy D7 (Accessible housing). Of the 210 homes, 90% would be in accordance with Part M (2) of Approved Document M of the Building Regulations and 10% (21 dwellings) would be in accordance with Part M4(3) as wheelchair adaptable homes. A condition is recommended that would secure this and proportional distribution across the tenures.

- 6.8.4 Level pedestrian access would be provided to the residential and commercial units in and around the site within 2 Berol Yard and Berol House in accordance with requirements of Building Regulations, Part M.

*Indoor and Outdoor Space Standards*

- 6.8.5 All of the proposed homes would meet the minimum internal space and floor to ceiling heights (2.5m) standards require by London Plan Policy D6. Proposed layouts are generally good and the number of homes per core would be in accordance with the adopted Mayoral guidance.

- 6.8.6 All flats would have private amenity space in the form of a balcony or roof terrace. Along the Watermead Way elevation amenity space would be provided in the form of internalised space. In addition, all homes would also have access to a proposed communal amenity space provided at podium level, and at levels 18 and 30 of 2 Berol Yard.

*Unit Aspect, outlook, and privacy*

- 6.8.7 The majority of the homes would be dual aspect and the remaining single aspect homes would be enhanced through additional windows facing onto their recessed balconies. 33% of the units would be single aspect (albeit all enhanced with glazing located on a second facade to the balcony), 65% would be dual aspect, with the remaining 2% being triple aspect.

- 6.8.8 This approach is considered acceptable in line with Policy D6 (Housing quality and standards) of the London Plan which requires proposals to maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.

- 6.8.9 The approach to providing some single aspect homes is considered appropriate given the site constraints. Single aspect dwellings have only been provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 (Optimising site capacity through the designed approach).

*Daylight/Sunlight – 2 Berol Yard*

- 6.8.10 The layouts of the new homes maximise access to daylight in living, dining, working, and sleeping areas with the bathrooms, storage, and utility areas being located in the deeper parts of the plan. This arrangement, alongside repeated floors, allows for the stacking of uses to safeguard against neighbouring noise impacts. This is promoted by Policy D6 of the London Plan and in the Mayor of London's Housing SPG (March 2016).

- 6.8.11 Analysis of the proposed residential accommodation shows that daylight and sunlight levels are appropriate for this type of development with the majority of rooms seeing full compliance with the BRE Report daylight guidance. Sunlight levels must be considered in the context of the urban nature of the site and the

area intentions. As with most urban sites of this nature direct sunlight amenity within some rooms will be limited.

- 6.8.12 Given the character and form of the property and its urban location the daylight and sunlight amenity of the proposed development is considered to be acceptable. The assessment demonstrates that the development is appropriate in the context of the BRE guide and relevant policy, particularly having regard to the flexibility inherent to the BRE guide and its suburban basis, the urban character of the site and its surroundings and the character of the proposed development.
- 6.8.13 Additionally, analysis of the DLSL of the internal space within the proposed scheme concludes that the daylight and sunlight amenity is above expectations with the majority of rooms seeing compliance with the BRE Report guidance. The proposed development therefore accords with the London Plan policy D6 (Housing quality and standards).

*Noise*

- 6.8.14 The applicant's Noise Impact Assessment sets out sound insulation requirements to ensure that the internal noise environment of homes meets the relevant standards and recommends that background ventilation is provided by mechanical ventilation with heat recovery. It is recommended that further details of the proposed system and mechanical ventilation are secured by way of a planning condition to ensure acceptable internal noise levels.
- 6.8.15 It is recommended that conditions are attached to a planning permission to control mechanical plant noise by way of a standard planning condition (calibrated to reflect the site-specific noise environment).
- 6.8.16 Conditions are also recommended to secure adequate mitigation to prevent undue noise transmission between the proposed ground floor commercial units and the proposed homes above and to limit the hours of use of any commercial use to 07.00 to 23.00 (Monday to Saturday) and 08.00 to 23.00 (Sundays and Public Holidays).

*Amenity space and play space*

- 6.8.17 Communal amenity space totalling 554.2 sqm would be provided at podium level, and at levels 18 and 30 of 2 Berol Yard. The landscape design of the roof terraces seeks to create a series of different types of spaces with different functions.
- 6.8.18 The proposals include an external garden space at podium level, communal garden terrace on top of Block A at level 18 and an internal community space located at level 30. The podium level and external 18th floor rooftop gardens would be decked with raised planters of informal plantings of grasses and perennials. Seating would be integrated with the planter edges. The highest

outdoor roof (above the eighteenth storey element) would provide extensive wildflowers growing beneath solar panels.

6.8.19 Internal community space will be provided at roof level 30. The space would be enclosed and glazed offering views to the north, south and east of the site. The room would provide immediate access to an inset balconied area providing external amenity space to the northeast and southwest of the floor. Berol House has been designed to incorporate a large private roof terrace which will be accessed by occupiers.

#### *Play Space*

6.8.20 In accordance with the requirements of GLA's Play and Informal Recreation Supplementary Planning Guidance, suitable play space provision is proposed. A child yield and play space calculation has been applied to the 210 homes proposed. Play provision for over 11-year-old children is located in Down Lane Park which is a 194m walk from 2 Berol Yard and soon to undergo substantial investment funded by recent developments in the area.

6.8.21 Play provision for 2 Berol Yard is located at the podium level and the upper roof terrace of 2 Berol Yard accessed only by the residents. The garden integrates 370sqm of play space for children aged 0 to 11 years old, comprising formal and informal play opportunities including, sand, balancing beams and boulders, a climbing structure, and other play elements.

### **6.9 Social and Community Infrastructure**

6.9.1 The NPPF (Para. 57) makes clear that planning obligations must only be sought where they meet the tests of necessity, direct relatability and are fairly and reasonably related in scale and kind to the development. This is reflected in Community Infrastructure Levy (CIL) Regulation 122.

6.9.2 London Plan Policy S1 states adequate provision for social infrastructure is important in areas of major new development and regeneration. This policy is supported by a number of London Plan infrastructure related policies concerning health, education, and open space. London Plan Policy DF1 sets out an overview of delivering the Plan and the use of planning obligations.

6.9.3 Strategic Policy SP16 sets out Haringey's approach to ensuring a wide range of services and facilities to meet community needs are provided in the borough. Strategic Policy SP17 is clear that the infrastructure needed to make development work and support local communities is vital, particularly in the parts of the borough that will experience the most growth.

6.9.4 This approach is reflected in the Tottenham Area Action Plan in Policies AAP1 and AAP11. DPD Policy DM48 notes that planning obligations are subject to viability and sets a list of areas where the Council may seek contributions. The

Planning Obligations SPD provides further detail on the local approach to obligations and their relationship to CIL.

- 6.9.5 The Council expects developers to contribute to the reasonable costs of new infrastructure made necessary by their development proposals through CIL and use of planning obligations addressing relevant direct impacts. The Council's Annual Infrastructure Funding Statement (December 2021) sets out what Strategic CIL can be used for (infrastructure list) and how it will be allocated (spending criteria).

*Health – NHS Contribution request*

- 6.9.6 The NHS has requested a S106 contribution of £233,335.00 to “increase capacity of health infrastructure serving the proposed development” based on calculations from their HUDU Planning Contributions Model (HUDU Model).
- 6.9.7 The NHS acknowledge that the primary care element of the demand created by the development would be able to be accommodated within the new Welbourne Centre which would serve 20,000 registered patients. However, the concern is with the other demands on health infrastructure including acute, mental health, and community infrastructure.
- 6.9.8 Whilst the need for such expansion of capacity for acute, mental health, and community infrastructure is acknowledged, it is noted that the adopted Community Infrastructure Levy (CIL) Charging Schedule (2022) sets a rate of £100.00 per square metre for the proposed development on the basis it is Build to Rent.
- 6.9.9 This is double the charge for a conventional residential scheme composed of housing for sale. The evidence base supporting the CIL charging schedule is found in the Community Infrastructure Levy: Eastern Haringey Viability Update Study (2021), prepared by BNP Paribas (BNPP) on behalf of the Council.
- 6.9.10 In setting the adopted CIL rate for Build to Rent schemes, BNPP included an allowance of £1,000 per unit for s106 costs. Para. 4.28 of BNPP's evidence states that “the figure [£1,000 per unit] is considered by the Council to be a reasonable proxy for the likely sums to be sought.” Any material increases above this level could potentially render the scheme unviable and affect the provision of affordable housing and/or other public benefits.
- 6.9.11 Given the proximity of the new Welbourne Centre to the proposal (within Tottenham Hale District Centre to the southwest of the site) and its potential to offer services other than primary care, the requested contribution from the NHS is considered to be disproportionate.
- 6.9.12 Given this context it would be unreasonable to seek the full requested NHS contribution. However, the applicant has committed to providing a capped

contribution of £25,000 prior to Practical Completion of 2 Berol Yard to support local NHS services.

*Future proofing bridge connection*

- 6.9.13 It is not yet possible to deliver the bridge over Watermead Way and the railway into Hale Village given that the station and railway is safeguarded for Crossrail 2. The costs of the entire bridge will need funding from a wide range of sources beyond this single project.
- 6.9.14 Whilst the development would not warrant such a significant infrastructure contribution, the height of the tower and the key role the proposed building would play in marking the Green Grid does warrant a contribution to it. As such, the developer has committed to delivering a public access stairway, lift, and bridgehead constructed as part of the 2 Berol Yard building.
- 6.9.15 The contribution would provide a permissive path right of access for members of the public to pass, with and without bicycles to the bridgehead. A bicycle track within the public access stairway would also be provided. The applicant would also maintain the public access stairway, lift, and landing area at no expense to the Council (including all lighting, cleaning, etc.).
- 6.9.16 Prior to the construction of the future potential bridge, glazing to the external façade to provide an additional winter garden space as an extension to the 2 Berol Yard Cultural and Arts Space (Use Class F2 Community / Affordable Workspace) would be installed.
- 6.9.17 The applicant has submitted costings for the works which are equivalent to £518,700.00. This contribution is considered to be proportionate to the scheme and would not include the management and maintenance costs which would also be covered by the applicant/landowner.

*Cultural and Arts Space*

- 6.9.18 The Regeneration team has requested a 25-year lease for the Cultural and Arts Space and for the Public Art, as well as a peppercorn rent for the space and relief on auxiliary and service costs for the full term of the lease, as well as a payment to contribute to the staffing and activation budget for the first 5 years.
- 6.9.19 Whilst there is no policy requirement for such a space or for the length of leases and rents requested the applicant acknowledges the need for a community use. The proposal includes 161sqm of Cultural and Arts Space (Use Class F2 Community) floorspace to be constructed on the first floor of 2 Berol Yard. The space also has the potential to be used as Affordable Workspace should that better suit the needs of the community at the time.
- 6.9.20 The space would also be extended to include the public gallery and winter garden area until the potential future bridge is opened. The Cultural and Arts

space would be constructed to CAT A standard, and a lease would be offered to the Council and other prospective operators prior to occupation of the BtR element.

6.9.21 The proposed 15-year lease reflects the lease associated with BtR covenant; the applicant has stated that they would be unable to viability provide a longer lease which is accepted given the policy context.

6.9.22 In any event a lease would be offered to Haringey Council for use by Made by Tottenham (or other such nominated body involved with the arts, creative trade, or local industry) with a discount of 20% of the prevailing market rent and a rent-free period of 3 years. The Lease would also include a right to renew for 2 further 5-year periods after the initial 15 year period, subject to agreement by both parties.

6.9.23 These commitments, to be secured through the s106, would support the delivery of a community space that would provide a decent rent-free period to a well-fitted out space at the heart of the new development. This would be a public benefit to the scheme and the wider area.

#### *Public Art*

6.9.24 In addition to the Cultural and Arts Space the applicant has committed to delivering public art within the proposed new square for a period of ten years from the date of occupation of the BtR element. The public art would include lighting and would be of a suitable size (5m x 5m) to be sufficiently impactful.

6.9.25 The space for the public art would be available for not less than 3 months of each year to showcase Tottenham talent.

#### *Social and Community Infrastructure summary*

6.9.26 The proposal would make proportionate contributions to infrastructure in terms of a new bridgehead and associated access, and through a Cultural and Arts Space and Public Art in the proposed public square. A contribution would also be made to the NHS. These contributions, secured by s106, would deliver public benefits that fairly and reasonably related in scale and kind to the development. There has been significant investment in the area from other developments to improve the public realm and Down Lane Park to deliver the ambitions of the Tottenham AAP.

### **6.10 Transportation, parking, and highway safety**

6.10.1 The NPPF (Para. 110) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up and that the design of streets and other transport elements reflect national guidance (including the National Design Guide).

- 6.10.2 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle, or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.
- 6.10.3 Other key relevant London Plan policies include Policy T2 – which sets out a ‘healthy streets’ approach to new development and requires proposals to demonstrate how it will deliver improvements that support the 10 Healthy Street Indicators and Policy T7 – which makes clear that development should facilitate safe, clean, and efficient deliveries and servicing and requires Construction Logistics Plans and Delivery and servicing Plans.
- 6.10.4 Policy SP7 states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking, and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in DM Policies DM31 and DM32.
- 6.10.5 DM Policy (2017) DM32 states that the Council will support proposals for new development with limited or no on-site parking where there are alternative and accessible means of transport available, public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index, a Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development, parking is provided for disabled people, and parking is designated for occupiers of developments specified as car capped.

#### *Transport Assessment*

- 6.10.6 The site has a PTAL of 5-6a (where 1 is least accessible and 6b is most accessible). Tottenham Hale Underground Station is 180m from the site. The site is also located in The Hale CPZ. The application is supported by a Transport Assessment (TA), Residential and Commercial Framework Travel Plan, a Delivery and Servicing Plan and an Outline Construction Logistics Plan.

#### *Car Parking*

- 6.10.7 The proposed development would be car free (not including blue badge and the interim scenario) which would be acceptable given the excellent public transport accessibility of the site. This is supported both by London Plan policy T6 (Car parking) and the Tottenham Area Action Plan (site allocation TH6).
- 6.10.8 2 Berol Yard includes the provision of 8 accessible car parking spaces (one for retail and 6 for residential), with a further 15 accessible residential parking spaces designed into the scheme, should the demand for additional accessible spaces be required. Berol House provides one accessible parking space.

6.10.9 The Transport Planning team have raised concerns regarding the proposed level of Blue Badge Parking for Berol House (1 space). However, the GLA in their stage 1 response have confirmed that this would be policy compliant. The provision is therefore accepted.

6.10.10 The Applicant has highlighted that it expects the residential Blue Badge parking provision not to exceed demand, based on the results of Blue Badge parking surveys for other sites that show low utilisation of such bays. This provides a potential opportunity to increase Blue Badge parking for the commercial use by converting unused residential Blue Badge parking spaces, if required. A condition is recommended which would seek details of the works.

6.10.11 The scheme therefore accords with the London Plan policies T6 (Car parking), T6.1 (Residential parking), T6.2 (Office parking), T6.3 (Retail parking) and T6.5 (non-residential disabled persons parking). Further to this, the provision of car parking spaces also accords with the Local Plan policies SP7 (Transport), DM32 Parking and the Tottenham AAP (TH6) site allocation requirements.

6.10.12 The Application is based on a phased approach to the delivery of the car parking, reflecting the obligations to the existing tenants in Berol House who have leases which provide for rights to park cars on the estate. The temporary car parking arrangements have been designed to be removed and replaced with additional retail spaces, including a new unit facing Watermead Way.

6.10.13 Once the leases have expired, car parking would be removed from the ground floor to create Retail unit 1 (90.7sqm) and increase the size of Retail unit 2 by 114.9sqm. A condition is recommended which would seek details of the works.

#### *Cycle parking*

6.10.14 The proposed development provides a total of 482 cycle parking spaces. The proposed level of provision would be in accordance with London Plan standards and policy T5 (Cycling).

6.10.15 The Transport Planning team have highlighted that they would not support proposals for two-tiered cycle parking with aisle widths less than 2.5m. The proposals currently assume an aisle width of 2.5m which would be sufficient given the proposed type of stacking system (Josta® 2-Tier Cycle Rack) which requires less space than older 2-tier stacking systems.

#### *Servicing & Cyclist/Pedestrian access*

6.10.16 All servicing (excluding refuse collection arrangements) of the buildings would be undertaken on the servicing bays on Ashley Road and Watermead Way, with the majority of deliveries to be made by LGV's (Large Goods Vehicles). In order to ensure compliance and management of servicing and deliveries, this

would be monitored and reviewed regularly and would be implemented in line with a Delivery and Servicing Plan.

- 6.10.17 Monitoring would be provided as part of the Travel Plans (one for the commercial and one for the residential elements) secured through the s106. A Delivery and Servicing Management Plan would also be required through the recommended conditions which would set out the predicted impact of the development upon the local highway network and both physical infrastructure and day-to-day policy and management mitigation measures.
- 6.10.18 This would ensure that delivery and servicing activities are adequately managed such that the local community, pedestrian, cycle and highway networks and other highway users experience minimal disruption and disturbance, and so that deliveries and servicing are as efficient as possible to comply with London Plan policy T7 (Deliveries, servicing, and construction).
- 6.10.19 The infrastructure works under HGY/2017/2044 have already been fully delivered. This included an oversized loading bay on Watermead Way. The large length was delivered on the premise that it was going to host coaches for the college. The loading bay provided would be sufficient for any loading requirements of this scheme as outlined in the Transport Assessment.
- 6.10.20 As such, there are no proposed changes that would affect the existing section 278 / 106 Highways obligations relating to HGY/2017/2044. The use of a booking system for delivery slots would be used to minimise instances whereby multiple deliveries arrive at the same time, serving the same unit.
- 6.10.21 Further detail on management of deliveries would be provided within the detailed Delivery & Servicing Plan, that would be secured via the recommended conditions. This would include commentary on opportunities to liaise with other surrounding businesses with a view to minimising any adverse impacts associated with deliveries.
- 6.10.22 The proposal would introduce the undercroft pedestrian route through Berol House (known as Berol Passage) and deliver the pedestrian boulevard (known as Berol Walk) located along the eastern side of Berol House. The improvements to the Green Link or Ashley Link to the south of Berol House would also enhance pedestrian movement.
- 6.10.23 The accesses for the site would integrate and fall on desire lines with the pedestrian and cycle improvements on Ashley Road that are being delivered. The integrated approach takes into consideration the emerging developments and proposed works around the site, whilst improving the access and provision within the site area.

- 6.10.24 Public access to footpaths, cycleways and open spaces and the community space, including the future bridgehead would be provided via a Permissive Path right for public, visitors and the like. This would be secured through the s106. The s106 would also require the submission and implementation of an Approved Public Access Plan. Furthermore the landowner or their managing agent would be required to maintain the public realm areas in accordance with the standards of good estate practice.
- 6.10.25 TfL have requested that all year-round access is provided, and all routes are made to be public rights of way. Berol Passage, and the wider Berol Yard estate roads / public realm (including the Berol Square) are already subject to the existing Section 106 agreement which has secured public access, via the Public Access Plan – this was part of the existing planning permission granted in 2018 (HGY/2044/2018).
- 6.10.26 The Public Access Plan includes permissive path rights and allows for good estate management practice, whilst also enabling the Freeholder to comply with the rights of the Leaseholders who are already tenants on the remainder of the Estate.
- 6.10.27 All of the public realm is part of the wider estate management strategy which is carefully managed by the Freeholder to provide safe pedestrian access, whilst also maintaining servicing, deliveries, parking, and emergency access, along with retained rights by the Leaseholders for access and use.
- 6.10.28 Due to these existing rights, it is not legally possible for the applicant to formerly commit to the Public London Charter. Nevertheless, the principles established in the Charter are reflected in the existing Public Access Plan and secured through the existing Section 106 Agreement and the proposed Section 106 Heads of Terms include a commitment to extend this.

*Healthy Streets TA and Active Travel Zone (ATZ) Assessment*

- 6.10.29 The applicant has provided a Healthy Streets TA and ATZ assessment as part of the submission document. The ATZ assessment has chosen several key routes from the site to an array of locations.
- 6.10.30 After requests from TfL the applicant updated the ATZ assessment to include an 'onsite on street' assessment (undertaken 9th June 2023) which included a new route to Bright Gem Nursery (Journey 6). This updated ATZ assessment concludes that the route is attractive, easy to access, and appropriate for pedestrians and cycles. TfL also sought an on-site assessment which the applicant has now carried out.
- 6.10.31 As part of the on-site request TfL sought a reconsideration of routes to Cycleway 1 and assess whether these meet the TfL Cycle Route Criteria. The updated ATZ assessment has included an onsite review of this route and also

includes alternative routes to Cycleway 1 (Journeys 2,3 & 4). The ATZ assessment findings conclude that the quality of the route is suitable to accommodate pedestrians and cycle trips.

*Trip generation and impact*

- 6.10.32 TfL has requested that the applicant should conduct link load analysis of Tottenham Hale Station as the cumulative impact of all small-scale developments may cause a major impact to the system. The applicant has identified that the proposed development would have a negligible impact on the operation of Tottenham Hale Station, particularly when compared to the number of trips that were permitted to use the station as part of the previously permitted scheme.

*Safeguarding and Infrastructure Protection*

- 6.10.33 London Underground Infrastructure protection team have no objection in principle to the planning application. There are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure. Conditions are recommended to ensure the infrastructure is protected.

*Construction Logistics Plan*

- 6.10.34 The applicant has provided an Outline Construction Logistics Plan (CLP). A further plan is required by recommended condition which would ensure that construction details including the expected number of trips, vehicle routing, working hours and practices are provided. The plan would ensure the safety of road users and minimise disruption to the transport network.

*Car Club*

- 6.10.35 The applicant has confirmed that it intends to provide residents with three years car club membership including a £50 annual credit for those who register. This would be secured through the s106.

- 6.10.36 The Applicant highlights that Chapter 4 (Part 8) of the Transport Assessment (TA) includes an overview of nearby Car Club bays and likely walking routes to access these bays. In addition to those listed, it is important to note that as part of the original application (HGY/2017/2044), an agreement to provide an additional Car Club bay on Ashley Road is also proposed, that future residents of the site can benefit from. These are to be delivered by the Local Authority as part of the funded improvements to Ashley Road and the surrounding area associated with the original application.

- 6.10.37 The applicant has obtained feedback from Zipcar who operate the nearby Car Clubs. They recommend that the provision of the Car Club bay on Ashley Road which was agreed under the original consented scheme would be sufficient, based on a review of utilisation of the existing Car Club bays. It is proposed that as part of the Travel Plan process, there is a commitment to liaise with Zipcar to

understand utilisation of nearby Car Club bays. As such, the level of car club provision is considered to be acceptable.

### *Transport Conclusion*

6.10.38 Taking account of the exceptional (and improving) public transport accessibility of the site, the proposed restraint-based approach to car parking, its high level of cycle parking provision, and the enhancement of the pedestrian environment, the proposal would encourage sustainable travel behaviour amongst all residents, employees, and visitors. This would be further encouraged through the adoption of the Framework Travel Plan secured through the s106.

6.10.39 Other conditions and s106 obligations would ensure that the scheme meets the Transport requirements of local and London planning policy.

## **6.11 Air Quality**

6.11.1 London Plan Policy SI1 requires development proposals to meet a number of requirements to tackle poor air quality, protect health and meet legal obligations. Policy DM23 of the Haringey DM DPD requires all development to consider air quality and improve or mitigate the impact on air quality in the borough and users of the development.

6.11.2 The proposed development is located within an area of poor air quality and therefore it has been designated as an Air Quality Management Area (AQMA). As such, an Air Quality Assessment ('AQA') was prepared to support the planning application and considered the impacts of the development during the construction phase, the operational phase, and the potential for future residents to be exposed to poor air quality.

6.11.3 The assessment within the AQA of construction phase impacts identified a risk of dust soiling impacts and increases in particulate matter concentrations due to construction activities but through the implementation of mitigation measures, the effect of dust and particulate matter releases would be significantly reduced and the residual effects of the construction phase on air quality would be negligible.

6.11.4 The Council's Carbon Management Team (Pollution) have reviewed the report and raised no objection to its conclusions subject to conditions such as a construction environmental management plan and control of non-road mobile machinery securing appropriate mitigation measures. These conditions would be imposed should planning consent be granted.

6.11.5 The AQA also considered the potential air quality impacts associated with emissions from combustion plant associated with the operational phase and the pollutant considered in this part of the assessment was nitrogen dioxide (NO<sub>2</sub>).

- 6.11.6 To safeguard against additional unnecessary impacts to air quality, a further condition is recommended to mitigate future impacts during the operational phases of the development, including details to protect the internal air quality of the buildings as well as a requirement for ultra-low carbon dioxide boilers.
- 6.11.7 With regard to the potential for future residents of the proposed development to be exposed to poor air quality, given the site's location in an Air Quality Management Area, the AQA demonstrates the proposed development would cause a negligible impact when considering concentrations of NO<sub>2</sub> and as such the residual effects of the proposed development are not significant given concentrations of NO<sub>2</sub> would be below the relevant UK Air Quality Strategy objectives.
- 6.11.8 In conclusion, the proposal is not considered an air quality risk or harm to nearby residents or future occupiers and subject to the above conditions would be acceptable in this regard.

## **6.12 Energy, Climate Change and Sustainability**

- 6.12.1 London Plan Policy SI2 sets out the Mayor of London's energy hierarchy: Use Less Energy (Be Lean); Supply Energy Efficiently (Be Clean); Use Renewable Energy (Be Green) and (Be Seen).
- 6.12.2 It also sets a target for all development to achieve net zero carbon, by reducing CO<sub>2</sub> emissions by a minimum of 35% on-site, of which at least 10% should be achieved through energy efficiency measures for residential development (or 15% for commercial development) and calls on boroughs to establish an offset fund (with justifying text referring to a £95/tonne cost of carbon).
- 6.12.3 London Plan Policy SI2 requires developments referable to the Mayor of London to demonstrate actions undertaken to reduce life-cycle emissions.
- 6.12.4 London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top).
- 6.12.5 London Plan Policy SI4 calls for development to minimise overheating through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce the risk of overheating and need for active cooling in line with the Cooling Hierarchy.
- 6.12.6 London Plan Policy SI5 calls for the use of planning conditions to minimise the use of mains water in line with the Operational Requirement of the Buildings Regulations (residential development) and achieve at least BREEAM 'Excellent' standard for 'Wat 01' water category or equivalent (commercial development).

- 6.12.7 London Plan Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste.
- 6.12.8 Local Plan Strategic Policy SP4 requires all new development to be zero carbon (i.e., a 100% improvement beyond Part L of the 2013 Building Regulations) and a minimum reduction of 20% from on-site renewable energy generation. It also requires all non-residential developments to achieve a BREEAM rating 'Very good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.
- 6.12.9 Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.
- 6.12.10 Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout, and construction techniques. The Sustainability section in the report sets out the proposed measures to improve the overall sustainability of the wider scheme, including transport, health and wellbeing, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy and CO2 emissions and landscape design.

#### *Energy*

- 6.12.11 The principal target is to achieve a reduction in regulated CO2 emissions over Part L 2013 Building Regulations. The London Plan requires the 'lean', 'clean', 'green' and 'seen' stages of the Mayor of London's Energy Hierarchy to be followed to achieve a 'Zero Carbon' Standard (100% reduction over Building Regulations Part L), targeting a minimum onsite reduction of 35%, with 10% domestic and 15% non-domestic carbon reductions to be met by energy efficiency. All surplus regulated CO2 emissions must be offset at a rate of £95 for every ton of CO2 emitted per year over a minimum period of 30 years.
- 6.12.12 'Be Lean.' The applicant has proposed a saving of 57.5 tCO2 in carbon emissions (17%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors. This goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.
- 6.12.13 The windows in Berol House would be replaced and sealed to improve the fabric efficiency and air tightness. The addition of the extension on top of the refurbished part of the development would remove the roof which would limit the heat transfer to the outside as the upper-level extensions would further improve the insulation. The details of Mechanical Ventilation with Heat Recovery (MVHR) units would be sought through the recommended Energy strategy condition.

- 6.12.14 'Be Clean.' The applicant is intending to connect to the Tottenham Hale District Energy Network (DEN). Temporary connection to gas boilers until the DEN comes online is supported as an interim measure. The submitted DEN connection route is supported but would need to be designed to consider the following: detailed building entry design, expansion and stress – the straight N-S section may need an expansion loop, coordination with other buried services e.g. drainage, and coordination with above ground aspects.
- 6.12.15 As the commercial units are <500m<sup>2</sup>, the non-residential space should be connected to a single site wide network. Berol House and 2 Berol Yard should also be provided with a connection to the 2 Berol Yard energy centre. A DEN Connection condition is recommended which would ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan policies SI2 and SI3, and Local Plan policies SP4 and DM22.
- 6.12.16 'Be Green.' The application has reviewed the installation of various renewable technologies. The report concludes that only solar photovoltaic (PV) is suitable for the proposed development with the district heat network in place to deliver the Be Green requirement. A total of 6.7tCO<sub>2</sub> (1.9%) reduction of emissions are proposed under Be Green measures.
- 6.12.17 The proposed roof mounted PV array would cover an area of 140m<sup>2</sup> and 250m<sup>2</sup> on the roof of 2 Berol Yard and Berol House respectively. Other roof space would be occupied with amenity space and features. A living roof has been proposed under the solar panels. Recommended conditions would ensure the PVs are delivered and maintained effectively.
- 6.12.18 'Be Seen.' An energy monitoring system is proposed for the energy use and generation, and sub-metering/energy display devices in each apartment would allow residents to monitor and reduce their energy use. It is recommended that a planning condition requires the development owner to submit monitoring results to the GLA for at least 5 years post-occupation (in accordance with the Mayor of London's Be Seen Energy Monitoring guidance).

#### *Carbon Offsetting*

- 6.12.19 Despite the adoption of the 'Lean', 'Clean' and 'Green' measures outlined above, the expected carbon dioxide savings fall short of the zero-carbon policy target for proposed domestic and non-domestic uses. A carbon shortfall of 115 tCO<sub>2</sub>/year remains. The remaining carbon emissions would need to be offset at £95/tCO<sub>2</sub> over 30 years.
- 6.12.20 Based on 30-years of annual carbon dioxide emissions costed at £95 per tonne, this amounts to an estimated and approximate figure of £327,750.00. A 10% management fee would also be added to the final sum (approx.

£32,775.00). It is recommended that s106 planning obligations secure this indicative sum or any revised agreed sum that may be appropriate in the light of additional carbon savings that arise from further detailed design.

Energy conclusion

- 6.12.21 The overall anticipated on-site carbon emission reductions over Building Regulations (2013) (SAP10 carbon emission factors) of 72% and associated offsetting payment would meet London Plan Policy SI2. The proposed connection to an off-site DEN would also meet London Plan Policy SI4.
- 6.12.22 The proposed 'Lean' savings goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported. The intended connection to the DEN with interim temporary connection to gas boilers is also supported.
- 6.12.23 The proposed '1.9% 'Green' savings would be below the 20% called for by Local Plan Strategic Policy SP4. However, officers are satisfied that the amount of proposed roof top PV arrays have been optimised, given other demands for roof-top space. Other renewable energy technologies would not be suitable for this site as the development is connecting to the DEN.

Overheating

- 6.12.24 In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with Chartered Institution of Building Services Engineers (CIBSE) TM59 for residential and TM52 for non-residential with TM49 weather files (London Weather Centre), and the cooling hierarchy has been followed in the design.
- 6.12.25 The report has modelled 35 habitable rooms, 24 spaces and 2 corridors for the residential part of the development and 9 commercial spaces for the non-residential part. All residential zones pass the overheating requirements for 2020s DSY1 (moderately warm summer) and all non-residential zones pass the overheating requirements. Whilst the residential and non-residential zones would pass current requirements the performance in future years would be low. As such, a condition is recommended which requires further modelling of mitigation measures required to pass future weather files.
- 6.12.26 The assessment does not report the overheating assessment for the refurbishment and extension part of the development, and noise and air quality constraints in relation to the overheating risk require further assessment. An overheating condition is therefore recommended that would require an overheating assessment for the refurbishment and extension part of the development and remodelling at the locations where noise pollution is a constraint with closed windows.

Overheating conclusion

6.12.27 With recommended conditions attached the proposal would enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and subsequently maintained, in order to effectively reduce the impacts of climate change in accordance with London Plan policy SI4 and Local Plan policies SP4 and DM21.

*Environmental sustainability*

6.12.28 Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout, and construction techniques.

6.12.29 The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport and access, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy, CO2 emission and pollution management.

6.12.30 Intensive as well as extensive green roofs, standard trees, flowering perennial plants, unplanted detention basins, permeable paving, sealed surfaces are proposed as urban greening and biodiversity enhancement measures. 100% active Electric Vehicle Charging Points are also proposed.

*Non-Domestic BREEAM Requirement*

6.12.31 Policy SP4 requires all new non-residential developments to achieve a BREEAM rating ‘Very Good’ (or equivalent), although developments should aim to achieve ‘Excellent’ where achievable.

6.12.32 The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 57.5% is expected to be achieved, equivalent to ‘Very Good’ rating. A potential score of >65% could be achieved.

*Whole Life-Cycle Carbon*

6.12.33 Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

6.12.34 The percentage assumption for the mechanical, electrical, and plumbing (MEP) was revised by the applicant and maintenance (B2) and repair (B3) were added in line with the GLA guidance. The revised total calculated emissions based on the GIA (without grid decarbonisation) is estimated in Table 7 below:

*Table 7 - Whole Life-Cycle Carbon Assessment*

	<b>Estimated carbon emissions</b>	<b>GLA benchmark RESIDENTIAL</b>	<b>Embodied carbon rating (Industry-wide)</b>
<b>Product &amp; Construction</b>	414 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA benchmark (<850 kgCO <sub>2</sub> e/m <sup>2</sup> ) but	Modules A1-A5 achieve a band rating

<b>Stages</b> Modules A1-A5 (excl. sequestration)		misses the aspirational target (<500 kgCO <sub>2</sub> e/m <sup>2</sup> ).	of 'C', meeting the LETI 2020 Design Target.
<b>Use and End-Of-Life Stages</b> Modules B-C (excl. B6 and B7)	269 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA target (<350 kgCO <sub>2</sub> e/m <sup>2</sup> ) and aspirational benchmark (<300 kgCO <sub>2</sub> e/m <sup>2</sup> ).	
Modules A-C (excl B6, B7 and incl. sequestration)	658 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA target (<1200 kgCO <sub>2</sub> e/m <sup>2</sup> ) and the aspirational benchmark (<800 kgCO <sub>2</sub> e/m <sup>2</sup> ).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'A', meeting the RIBA2030 Design Target.
<b>Use and End-Of-Life Stages</b> Modules B6 and B7	461 kgCO <sub>2</sub> e/m <sup>2</sup>	N/A- This is the Modules B6 and B7 only. The End of Life Stage (C1-4) figure is reported separately and is 40 kgCO <sub>2</sub> e/m <sup>2</sup>	
<b>Reuse, Recovery, Recycling Stages</b> Module D	-236.16kgCO <sub>2</sub> e/m <sup>2</sup>	N/A	

6.12.35 Further information was submitted to the GLA on whole life carbon matters and the officer responded (June 15, 2023) to say that WLC matters are, on balance, considered to be largely addressed. Whilst some minor points have been raised within correspondence, the officer was satisfied that these matters are acceptably resolved in this circumstance and no further work is required on behalf of the applicant team. They recommended that the WLC Assessment Report (dated 25/05/2023) is included as an approved document on the draft decision notice.

*Circular Economy*

6.12.36 Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

6.12.37 The GLA confirmed (June 15, 2023) that circular economy matters are, on balance, considered to be largely addressed. Whilst some minor points have been raised within correspondence with the applicants, the GLA officer was satisfied that these matters are acceptably resolved in this circumstance and no further work is required on behalf of the applicant team. They recommended that the Detailed Circular Economy Statement (dated 25/05/2023) be included as an approved document on the draft decision notice.

*Construction waste*

6.12.38 A condition is recommended which requires a Site Waste Management Plan (SWMP) to be submitted for approval to reduce and manage/re-use waste during demolition and construction.

### 6.13 Urban Greening and Ecology

6.13.1 London Plan Policy G5 sets out the concept and defines Urban Greening Factor (UGF) as a tool used to evaluate and quantify the quality of urban greening provided by a development and aims to accelerate greening of the built environment, ensuring a greener London as it grows. All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5.

6.13.2 The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. This includes the incorporation of biosolar green roofing which supports multifunctionality, in accordance with policy G1 of the London Plan. The site forms part of a new green link within the Tottenham Hale District Centre Framework would support the realisation of this.

6.13.3 As highlighted by the GLA in the stage 1 response, the planning statement supporting the application sets out that the proposals are a mix of residential and commercial, therefore it is considered that this application meets the target of 0.3 set by policy G5 of the London Plan.

#### *Living roofs*

6.13.4 All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.

6.13.5 The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages.

6.13.6 The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth. Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of recommended planning conditions.

#### *Ecology*

6.13.7 London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. It is recommended the applicant provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D).

6.13.8 A condition is recommended which would require the submission of evidence to show the scheme would secure a biodiversity net gain. The condition would also

require provision of bird and bat boxes in trees and buildings to encourage biodiversity.

6.13.9 Furthermore, a condition is recommended which would require the preparation of an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation.

#### **6.14 Trees and landscaping**

6.14.1 The NPPF (Para. 131) stresses the importance of trees and makes clear that planning decisions should ensure that new streets are tree lined. London Plan Policy G7 makes clear that development should seek to retain and protect trees of value and replace these where lost.

6.14.2 The extent of existing vegetation on the current application site was covered in a wider Ecology Assessment as part of the Environmental Statement for the extant permission (Ref: HGY/2017/2044) for the Gessner Building to the northeast which together with the current application site formed the above consented hybrid application.

6.14.3 Mature and semi-mature trees are present adjacent to but beyond the application site boundaries. These trees were included in the ecology assessment as their root protection zones span the Berol Yard and Ashley Gardens sites. None of the proposed buildings as part of the current application would impact on the root protection zones of these trees.

6.14.4 London Plan Policy G5 states that development proposals should integrate green infrastructure to contribute to urban greening and the public realm by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. It is considered that green infrastructure forms an integral part of the wider landscape proposals and as such be in accordance with the above policy.

6.14.5 Haringey Local Plan Policy SP11 promotes high quality landscaping on and off-site and Policy SP13 seeks to protect and improve open space and providing opportunities for biodiversity and nature conservation. Further, Policy DM1 of the Haringey DM DPD requires proposals to demonstrate how landscape and planting are integrated into the development and expects development proposals to respond to trees on or close to a site.

6.14.6 The application incorporates a wider landscape proposal with substantial new planting and elements to encourage wider use of the space and improve its biodiversity. The application site is located in the southeast corner of the Ashley Road South Masterplan (ARSM), which sought to create a green link along this southern boundary to connect with Ashley Link to the west and the potential footbridge to the east.

- 6.14.7 The current proposals include new trees and planting to the east of the proposed public square so as to integrate with Ashley Link to the west, whilst trees and planting is also proposed to the south and east as the site meets Watermead Way. Further trees and landscaping are proposed in the open space between the two buildings proposed on site (Berol House and Berol Yard) as the site moves to the north.
- 6.14.8 The new landscaping and further trees are also incorporated further north in the open space between the refurbished Berol House and the Gessner building which forms part of a previous consented permission. Finally, the rooftops of both Berol House and Berol Yard would consist of extensive bio-solar, biodiverse and podium gardens as part of the overall landscaping strategy.
- 6.14.9 Subject to the imposition of conditions requiring details with regard to hard and soft landscaping, biodiversity and living roofs, it is considered that the proposals would be in accordance with the development plan policies outlined above in relation to landscaping and trees. There are no existing trees on the site.

## **6.15 Wind and Microclimate**

- 6.15.1 The London Plan Policy D8 seeks to ensure that public realm areas are well-designed, including, ensuring that microclimate considerations such as wind is considered to encourage people to spend time in a place.
- 6.15.2 London Plan Policy D9 calls for proposed tall buildings to carefully consider wind and other microclimate issues. Policy DM6 states that proposals for tall buildings should consider the impact on microclimate and Policy AAP6 requires a high-quality public realm for developments in Tottenham.
- 6.15.3 Wind mitigation was considered at the design stage and measures have been built into the design and architecture. The applicant has submitted three reports which give an assessment of the likely significant effects of wind on the proposals. Computer Fluid Dynamic (CFD) modelling has been used in the assessment.
- 6.15.4 The CFD methodology employed is considered plausible for the current study. Ordinarily, given the height of the scheme, wind tunnel studies would be expected to provide a more robust assessment. A CFD only approach was selected for this assessment. The applicant's wind consultant has confirmed that they are confident that the choice of analysis tool does not affect conclusions drawn from the results.
- 6.15.5 The wind assessment has been peer reviewed by an independent wind consultant, who has concluded that the assessment represents a plausible appraisal of the wind microclimate upon the introduction of the proposed

development. All their queries and requests for clarification have been satisfactorily addressed, and thus the conclusions can be considered to be robust.

6.15.6 Conditions are recommended which would ensure that quantitative assessments are carried out to validate the mitigation of on-site wind safety exceedances on the elevated levels, and the wind mitigation measures including landscaping are delivered and retained.

## **6.16 Flood Risk and Drainage**

6.16.1 Local Plan Policy SP5 and Policy DM24 of the DM DPD seek to ensure that new development reduces the risk of flooding and provides suitable measures for drainage. The site is entirely in Flood Zone 2 and has a medium probability of flooding from tidal and fluvial sources.

6.16.2 The nearest watercourses are the River Lee Navigation (approximately 340m to the east), Pymmes Brook (approx. 300m to the east). These discharge into the River Lee and eventually the Thames.

6.16.3 In terms of groundwater the site is located in the outer zone (Zone 2) of a groundwater Source Protection Zone (SPZ2) as defined by the Environment Agency.

6.16.4 The risk of the proposal exacerbating flood risks from tidal/coastal, groundwater, sewage and drainage infrastructure, and artificial sources to neighbouring property would be negligible or low.

6.16.5 It is acknowledged that in relation to drainage and flood risk, various details have been previously provided as part of the approval of details relating to planning application HGY/2017/2044, notably HGY/2018/2165 and HGY/2019/2068. Therefore, many of the principals and approaches for the management of surface water run-off from the development have been established and agreed as part of the previous consultations on planning applications submitted in relation to this site.

6.16.6 Conditions have been recommended by the Lead Local Flood Authority/Drainage Officer at the Council relating to surface water drainage details and the management and maintenance of the proposed drainage scheme.

6.16.7 The Mayor has raised concerns about the lack of water efficiency information. As such a condition is recommended which would ensure the higher Building Regulation standard Part G for water consumption would be met as a minimum for the residential Build to Rent element of the proposal. Submission of a Flood Warning and Evacuation Plan (FWEP) is also recommended.

- 6.16.8 The applicant has agreed to provide rainwater harvesting from the roofs of the proposed 2 Berol Yard building. This water would be collected and stored in separate underground tanks, then pumped back to surface when required for landscape maintenance. The rainwater harvesting would reduce the need for fresh water to water the landscaping. This system is separate to the surface water sustainable drainage strategy and would not collect any road run off.
- 6.16.9 A condition relating to surface water is recommended as well as an informative due to the closeness of the site to a Thames Water Sewage Pumping Station. A condition is also recommended relating to ensuring the existing water network infrastructure has sufficient capacity to accommodate the development.

## **6.17 Waste and Recycling**

- 6.17.1 London Plan Policy SI7 calls for development to have adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables and food. Local Plan Policy SP6 and Policy DM4 require development proposals make adequate provision for waste and recycling storage and collection.
- 6.17.2 The proposal at Berol Yard has mixed residential, commercial, and retail units and the developer has confirmed that the commercial and retail units will be collected by a private contractor. Waste from the commercial units would be collected from the centralised retail bin store located on the ground floor. Commercial tenants would be responsible for moving waste from their unit to the centralised bin store ready for collection.
- 6.17.3 The sizing of the bin store has been based on a twice weekly collection of waste and recycling from the outset. While commercial waste collection companies can provide collections to suit the client, up to twice daily collections 7 days per week, the Council is responsible for residential waste collections. As such, the store serving the residential element should be sufficient to store waste for one week.
- 6.17.4 The proposed waste storage for the BtR homes would be smaller than what is required for storage of waste for one week. However, due to ground floor constraints expansion of the waste store would result in the loss of retail space and/or units and would make the parking requirements unachievable.
- 6.17.5 The applicant has highlighted that they are planning to use compaction on site and that the building would be managed by a professional property manager who would be able to oversee the storage. Given these factors and in response to the waste comments, the applicant has agreed to a period of monitoring and reporting of waste collections with a possible additional payment if required.
- 6.17.6 Where twice weekly collections are required, established through the monitoring, the applicant/owner would reimburse the Council the cost of an additional vehicle

for collection. The monitoring would be required as part of a BTR Management Plan, set out in the s106.

## **6.18 Land Contamination**

6.18.1 Policy DM32 requires development proposals on potentially contaminated land to follow a risk management-based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.

6.18.2 LBH Pollution officers raise no objection to the proposals, subject to standard conditions on Land Contamination and Unexpected Contamination which have been recommended.

## **6.19 Archaeology**

6.19.1 The NPPF (para. 194) states that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development.

6.19.2 London Plan Policy HC1 states that applications should identify assets of archaeological significance and avoid harm or minimise it through design and appropriate mitigation. This approach is reflected at the local level in Policies AAP5 and DM9.

6.19.3 The site lies in an Archaeological Area. The site has Enfield Silt geology which is likely to have preserved prehistoric and later activity. The First Edition OS shows a possible fossilised linear route, preserved as a parallel field boundaries and planting, crossing the site from Hale Farm which lies under Down Lane Park, down to the Lea.

6.19.4 The Greater London Archaeological Advisory Service (GLAAS) have advised that the development could cause harm to archaeological remains and that a field evaluation is needed to determine appropriate mitigation. Although the NPPF envisages evaluation being undertaken prior to determination.

6.19.5 In this case given the nature of the development, the archaeological interest, and the practical constraints - A two-stage archaeological condition would provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

## **6.20 Fire Safety and Security**

6.20.1 London Plan Policy D12 makes clear that all development proposals must achieve the highest standards of fire safety and requires all major proposals to be

supported by a Fire Statement. The Mayor of London has published draft guidance of Fire Safety (Policy D12(A), Evacuation lifts (Policy D5(B5) and Fire Statements (Policy D12(B)).

6.20.2 The development would be required to meet the Building Regulations in force at the time of its construction – by way of approval from a relevant Building Control body. As part of the plan checking process a consultation with the London Fire Brigade would be carried out. On completion of the work, the relevant Building Control body would issue a Completion Certificate to confirm that the works comply with the requirements of the Building Regulations.

6.20.3 In this context the applicant has sought to achieve the highest standards of fire safety by providing the proposed building with a secondary staircase and evacuation lift in line with emerging legislation and good practice with regards to means of escape. The HSE are content with the proposals and the scheme complies with all current and emerging fire legislation at this stage.

6.20.4 The application is supported by a Fire Statement that meets the requirements of London Plan Policy D12 B. A condition which requires the development to be implemented in accordance with the submitted fire statements would ensure that the development incorporates the necessary fire safety measures in accordance with London Plan Policies D12 and D5.

6.20.5 An informative is also recommended which advises the applicant that if there are any changes to the scheme which require subsequent applications following the grant of any planning permission, an amended Fire Statement should also be submitted which incorporates the proposed scheme amendments so that the content of the Fire Statement always remains consistent with the latest scheme proposals.

## **6.21 Conclusion**

6.21.1 The proposal is a well-designed mixed-use scheme which would primarily provide Build to Rent accommodation (BTR) alongside an uplift over existing of approximately 2900sqm (GIA) of commercial space (Use Class E(a)) that fulfils the requirements of the site allocation.

6.21.2 The proposal provides 35% affordable housing consisting of London Living Rent and discount market rent housing in line with Policy H11 of the London Plan and the Council's Housing Strategy. The proposal provides a high quality of BtR accommodation.

6.21.3 The proposal provides a high-quality tall building and design that is supported by the QRP and would act as a landmark within the wider area. The proposal provides significant new employment opportunities and an additional community space, a new bridge head to support the delivery of a potential future bridge over

Watermead Way and the railway into Hale Village and would also make substantial contributions to infrastructure through the community infrastructure levy.

6.21.4 The impact on neighbouring amenity is considered to be in line with BRE guidance and acceptable. The proposed development would not have any further impact on the built historic environment given the context within which it would be located.

6.21.5 The proposal is a car free development and the impact on transportation is acceptable. The proposal achieves a high level of sustainability, would be zero carbon and would provide a sustainable design with provision to connect to a future district energy network.

6.21.6 The proposed landscaping would enhance tree provision and greenery and the Health and Safety Executive (HSE) have considered the scheme and are content with the proposals.

6.21.7 All other relevant policies and considerations, including equalities, have been considered when making the recommendation. Section 149 of the Equality Act 2010 created the public sector equality duty. Section 149 states:

- 1) A public authority must, in the exercise of its functions, have due regard to the need to:
  - a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;
  - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Officers have taken this into account and given due regard to this statutory duty, and the matters specified in Section 149 of the Equality Act 2010 in the determination of this application. There are no known equality implications arising directly from this development.

6.21.8 Planning permission should be granted for the reasons set out above. The details of the decision are set out in the RECOMMENDATION under section 8.0.

## **7.0 COMMUNITY INFRASTRUCTURE LEVY**

Based on the information given on the plans, the Mayoral CIL charge will be approximately £1,602,776.5 (22,950m<sup>2</sup> x £ £64.55) for 2 Berol Yard and £128,389.95 (1,989m<sup>2</sup> m<sup>2</sup> x £ £64.55) for Berol House; the Haringey CIL charge will be approximately £2,454,043.50 (22,950m<sup>2</sup> x £106.93) and is likely to only apply to 2 Berol Yard. This will be collected by Haringey should the scheme be implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

These figures are approximate and are subject to change at the confirmation of liability stage and will need to consider the latest indexed figures in the Annual CIL Rate Summary and the ability to discount existing floorspace that is demonstrated to have been in use for a continuous 6 months in the past 36 months. An informative will be attached advising the applicant of this charge.

## **8.0 RECOMMENDATION**

That the Committee resolve to GRANT PLANNING PERMISSION and that the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to signing of a section 106 Legal Agreement.

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# Appendix 3 - PSC Report Appendices for HGY.2023.0261

## Appendix 2: Plans of the Proposed Scheme & Images

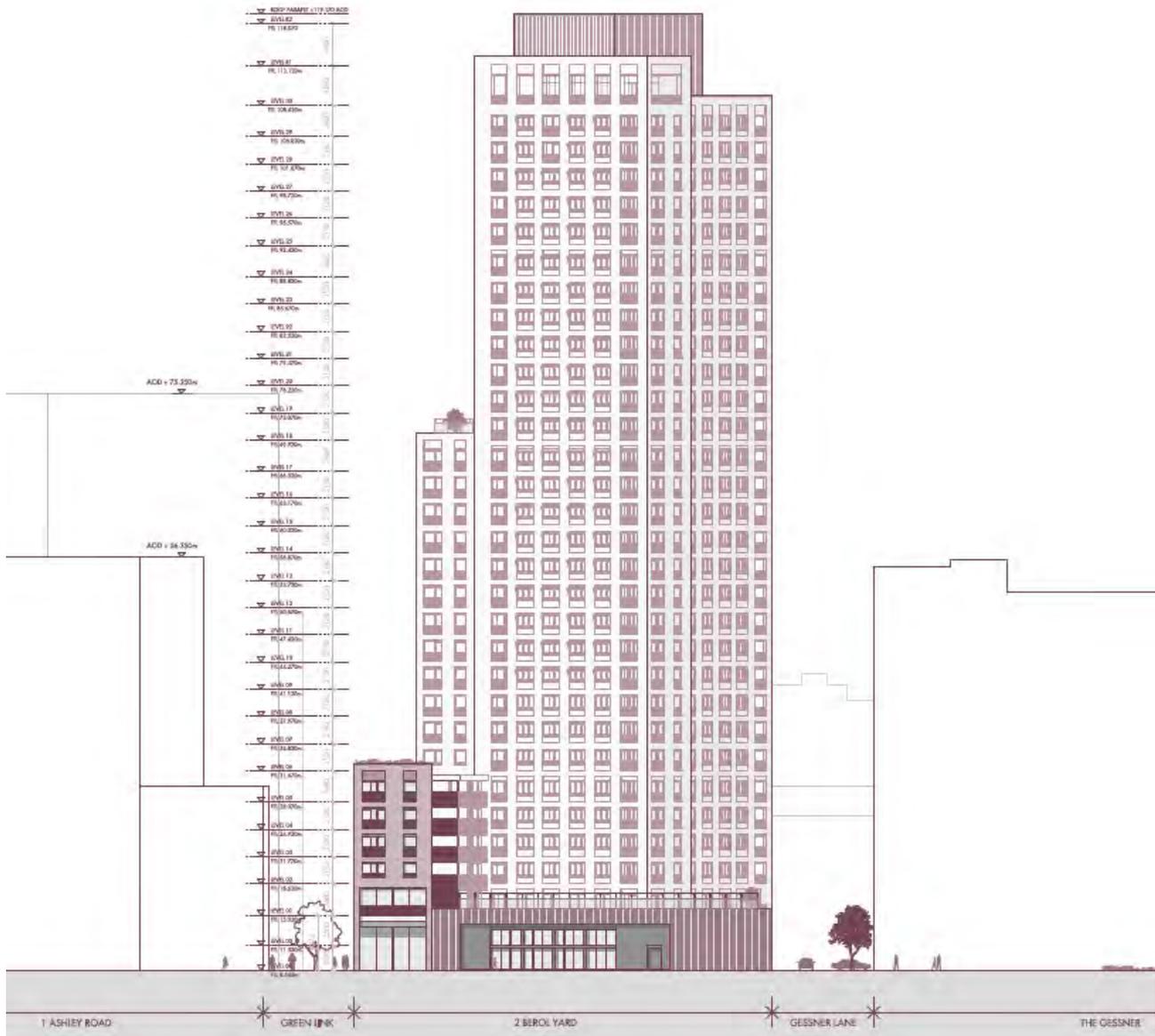
### Site Location plan



2 Berol Yard in context



2 Berol Yard Elevation from the East



### 2 Berol Yard Elevation from the West



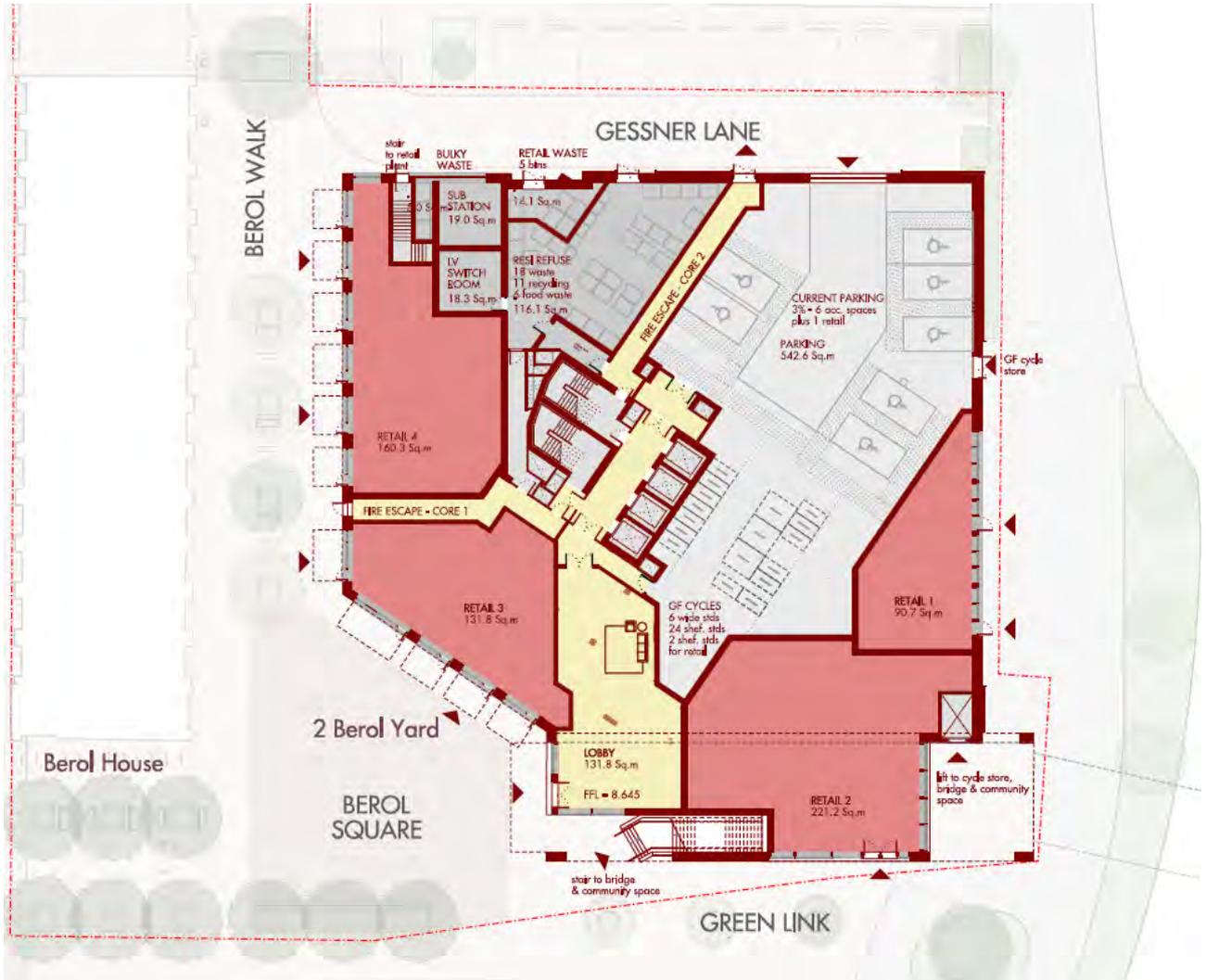
### 2 Berol Yard Elevation from the South



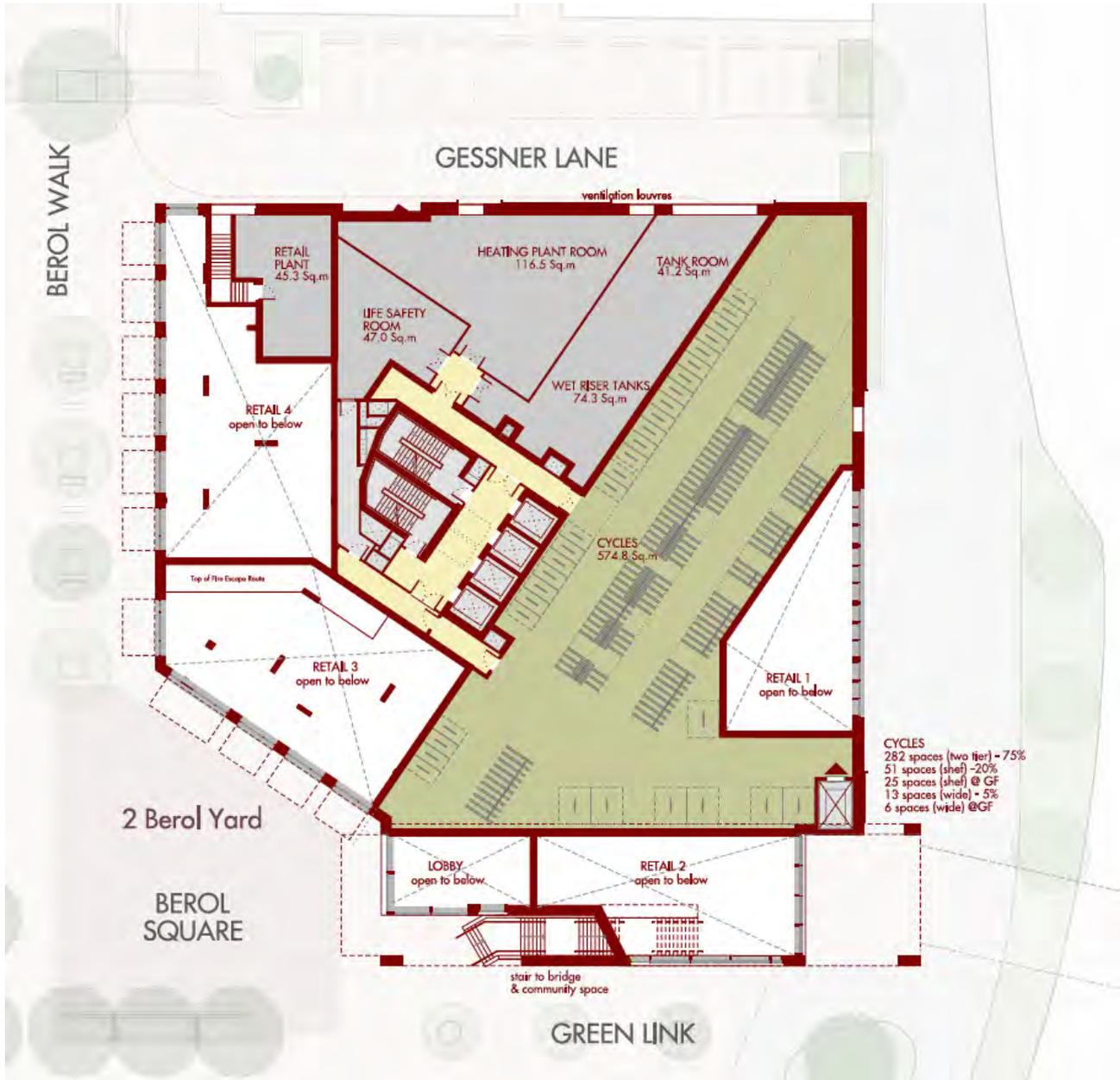
2 Berol Yard Elevation from the north



2 Berol Yard Ground Floor plan



2 Berol Yard Mezzanine floor plan



2 Berol Yard First floor plan



2 Berol Yard Floor Plan Levels 2-5



2 Berol Yard Floor Plan Levels 6-16



2 Berol Yard Floor Plan Level 18



2 Berol Yard Floor Plan Levels 25-27



2 Berol Yard Floor Plan Levels 28-29



2 Berol Yard Floor Plan Level 30



2 Berol Yard Roof Plan



Berol House Elevation to the East (top) and West (bottom)

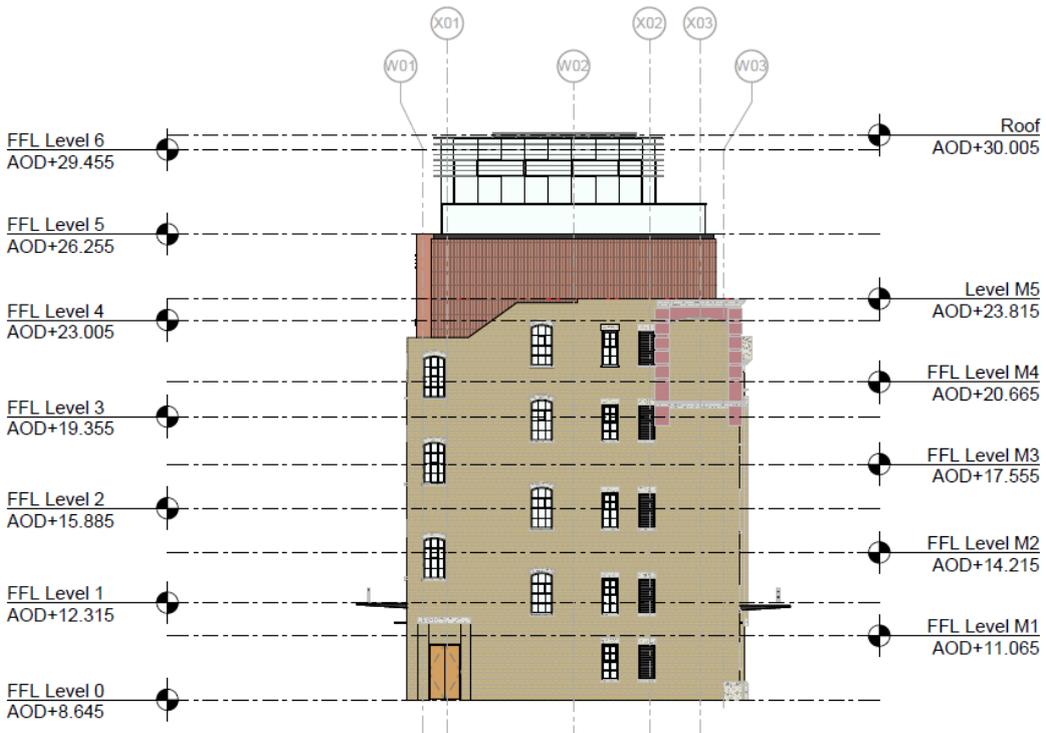
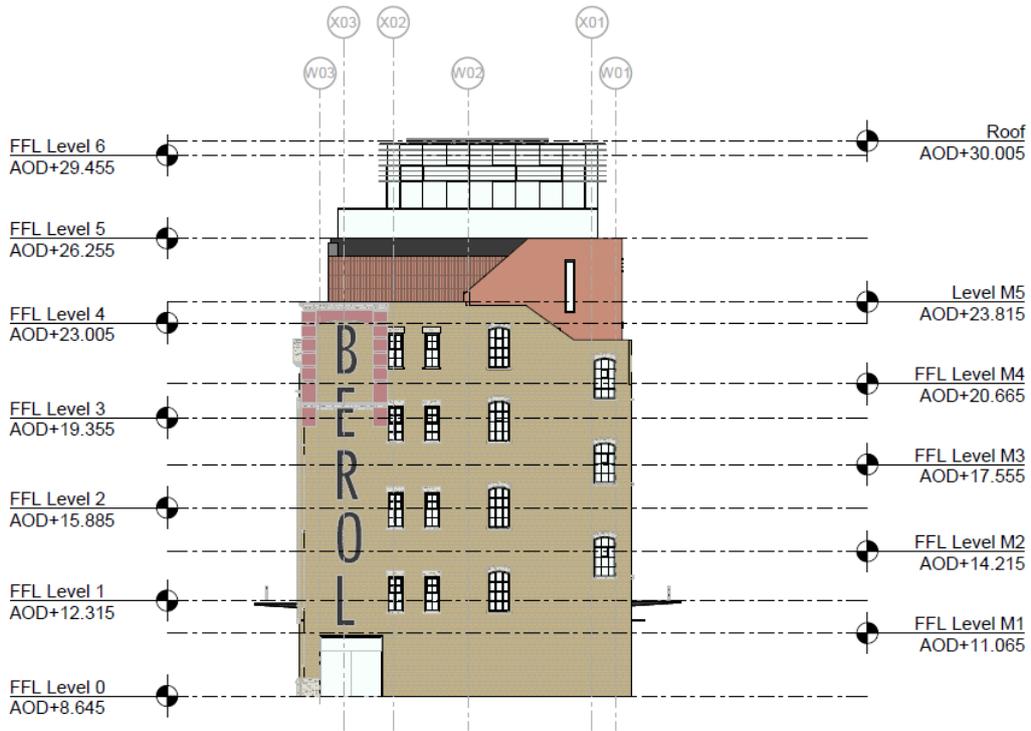


1 Elevation West 1:200

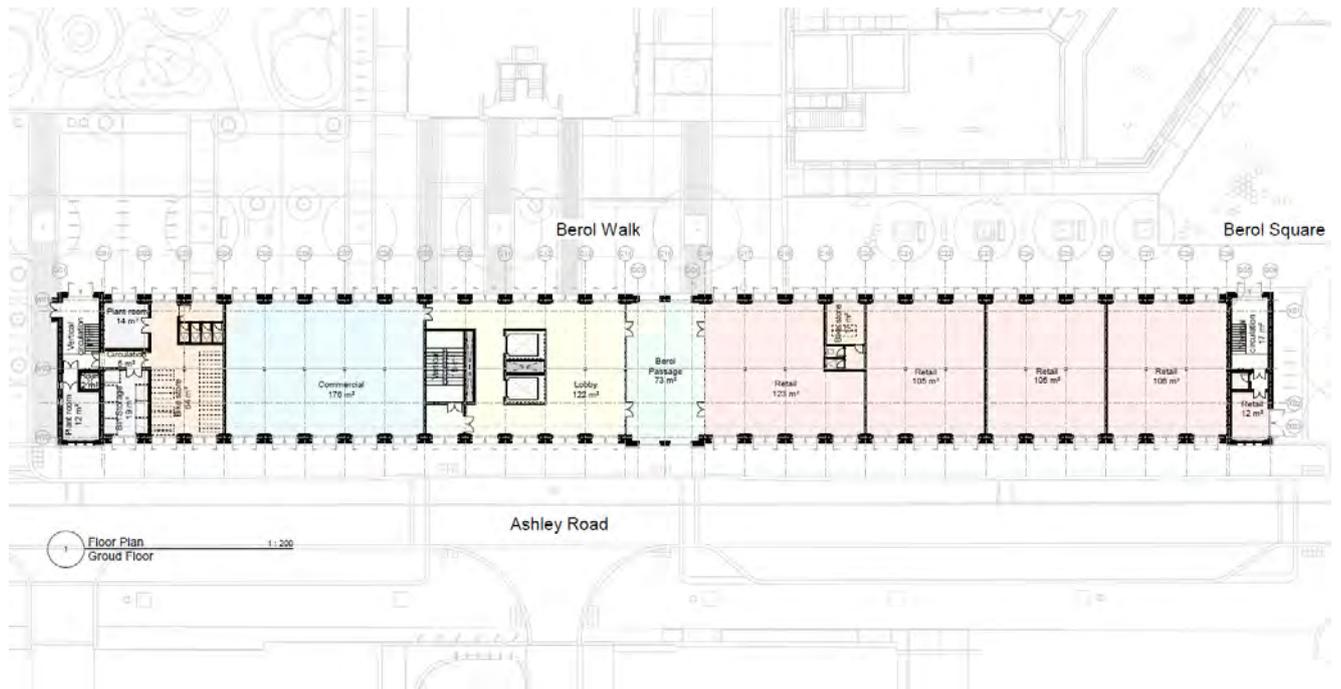


2 Elevation East 1:200

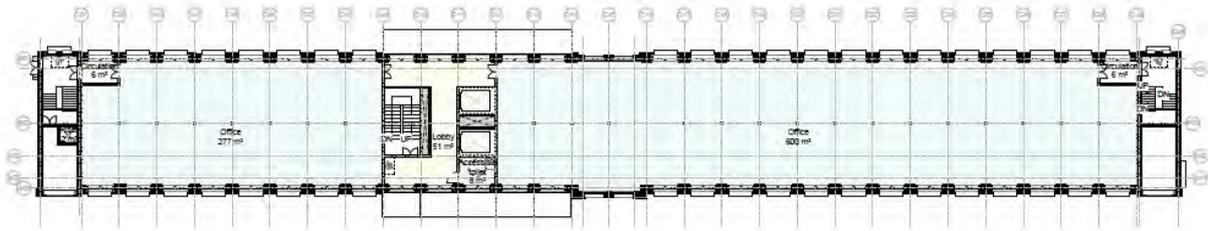
**Berol House to the South (top) and North (bottom)**



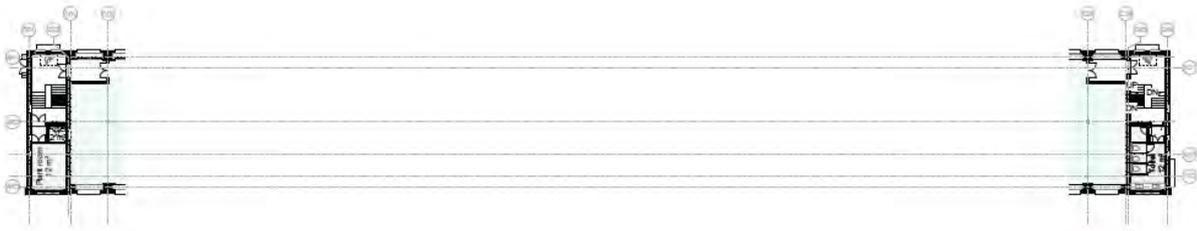
Berol House Ground Floor



Berol House Level 1 with Gable Mezzanine

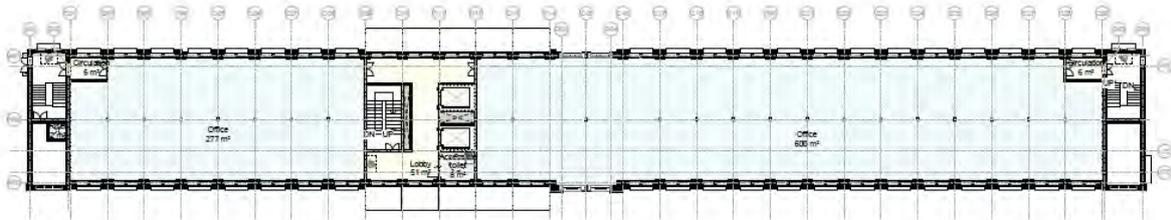


1 Floor Plan  
First Floor 1:200



2 Floor Plan  
Gable mezzanine level 01 1:200

Berol House Level 2 with Gable Mezzanine

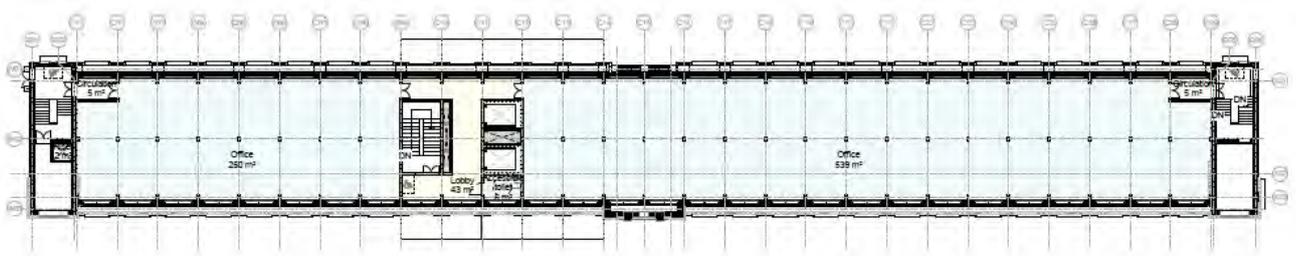


1 Floor Plan  
Floor 02 1:200



2 Floor Plan  
Gable mezzanine level 02 1:200

**Berol House Level 3 with Gable Mezzanine**

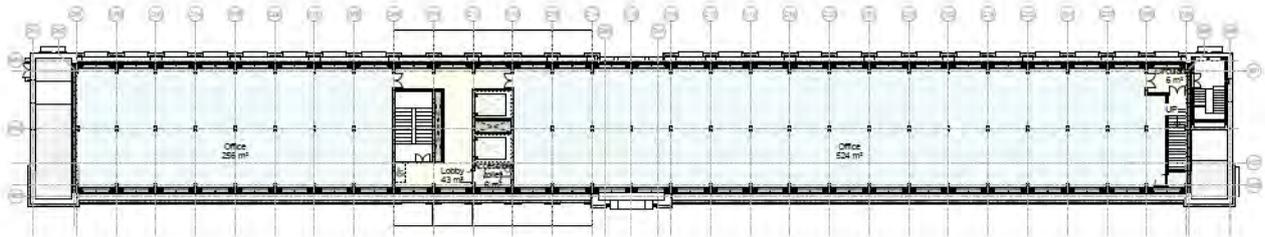


1 Floor Plan 1:200  
Floor 03

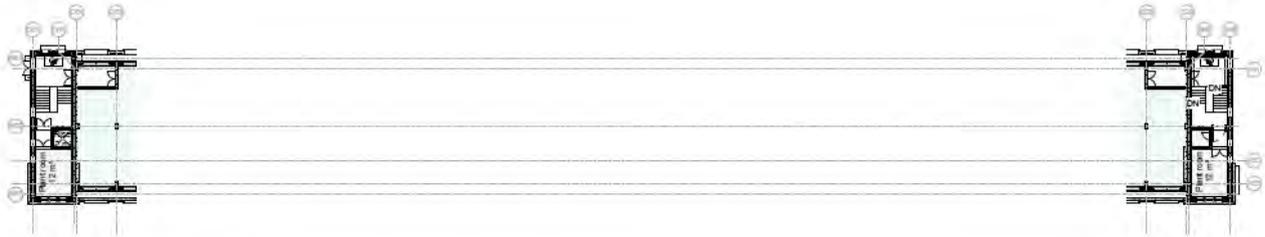


2 Floor Plan 1:200  
Gable mezzanine level 03

Berol House Level 4 with Gable Mezzanine

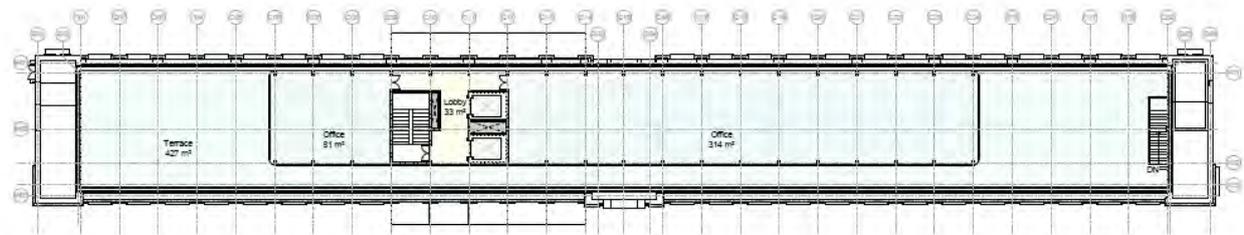


1 Floor Plan  
Floor 04 1:200

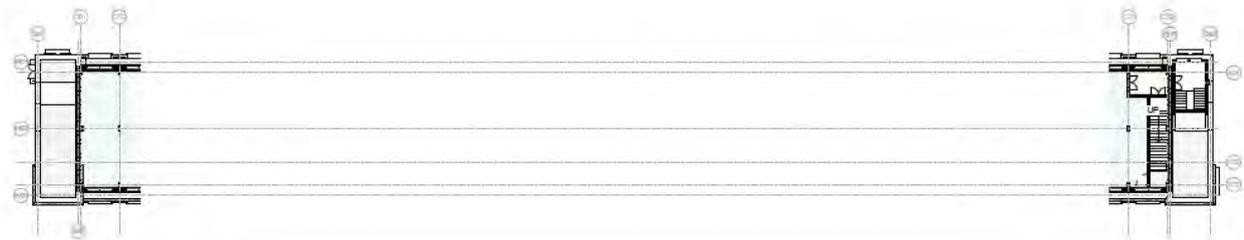


2 Floor Plan  
Gable mezzanine level 04 1:200

**Berol House Level 5 with Gable Mezzanine**

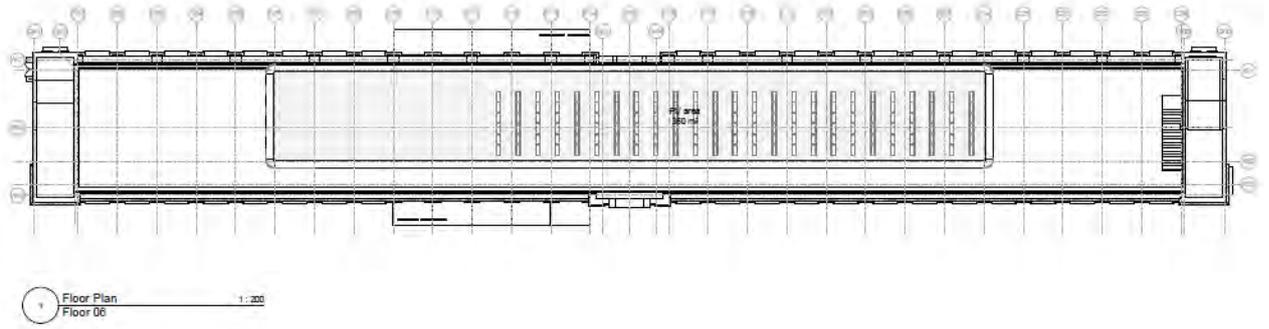


1 Floor Plan 1:200  
Floor 05



2 Floor Plan 1:200  
Gable mezzanine level 05

Berol House Level 6



Berol Yard Square CGI



2 Berol Yard from Square CGI



Entrance to 2 Berol Yard



**Berol House from the Square**



**Berol House and Berol Yard from a Distance**



Community Space CGI



Berol Yard at Eye Level



Walkway to the Square



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### Appendix 3: Internal and External Consultee representations

Stakeholder	Question/Comment	Response																
<b>INTERNAL</b>																		
LBH Carbon Management	<p><b>Carbon Management Response 20/06/2023</b></p> <p>In preparing this consultation response, we have reviewed:</p> <ul style="list-style-type: none"> <li>• Energy Statement (BQ-WSP-XX-XX-ST-ES-0001-no_appendix_June2023) prepared by WSP (dated 13<sup>th</sup> June 2023)</li> <li>• GLA Carbon Emission reporting spreadsheet dated May 2023</li> <li>• HGY-2023-0261 Berol Quarter N17 – May response to the comments from CMT</li> <li>• Noise and Vibration Assessment prepared by WSP (dated December 2022)</li> <li>• Relevant supporting documents.</li> </ul> <p><b>1. Summary</b></p> <p>The development achieves a reduction of 72% carbon dioxide emissions. This increase in on-site savings is supported in principle. Some clarifications must be provided with regard to the Overheating Strategy. Appropriate planning conditions have been recommended to secure this which includes some outstanding requests for information.</p> <p><b>2. Energy Strategy</b></p> <p>The applicant has amended the carbon reduction values in the report and submitted the GLA’s carbon emission reporting spreadsheet.</p> <table border="1" data-bbox="497 1094 1700 1394"> <thead> <tr> <th colspan="4" data-bbox="497 1094 1700 1133"><i>Site-wide (SAP10 emission factors)</i></th> </tr> <tr> <th data-bbox="497 1133 797 1283"></th> <th data-bbox="797 1133 1097 1283"><b>Total regulated emissions (Tonnes CO<sub>2</sub> / year)</b></th> <th data-bbox="1097 1133 1397 1283"><b>CO<sub>2</sub> savings (Tonnes CO<sub>2</sub> / year)</b></th> <th data-bbox="1397 1133 1700 1283"><b>Percentage savings (%)</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="497 1283 797 1358"><b>Part L 2013 Baseline</b></td> <td data-bbox="797 1283 1097 1358">412.4</td> <td data-bbox="1097 1283 1397 1358"></td> <td data-bbox="1397 1283 1700 1358"></td> </tr> <tr> <td data-bbox="497 1358 797 1394"><b>Be Lean</b></td> <td data-bbox="797 1358 1097 1394">322.1</td> <td data-bbox="1097 1358 1397 1394">90.3</td> <td data-bbox="1397 1358 1700 1394">22%</td> </tr> </tbody> </table>	<i>Site-wide (SAP10 emission factors)</i>					<b>Total regulated emissions (Tonnes CO<sub>2</sub> / year)</b>	<b>CO<sub>2</sub> savings (Tonnes CO<sub>2</sub> / year)</b>	<b>Percentage savings (%)</b>	<b>Part L 2013 Baseline</b>	412.4			<b>Be Lean</b>	322.1	90.3	22%	Recommended conditions and s106 heads of terms included.
<i>Site-wide (SAP10 emission factors)</i>																		
	<b>Total regulated emissions (Tonnes CO<sub>2</sub> / year)</b>	<b>CO<sub>2</sub> savings (Tonnes CO<sub>2</sub> / year)</b>	<b>Percentage savings (%)</b>															
<b>Part L 2013 Baseline</b>	412.4																	
<b>Be Lean</b>	322.1	90.3	22%															

<b>Be Clean</b>	121.7	200.4	49%
<b>Be Green</b>	115	6.7	2%
<b>Cumulative savings</b>		297.4	72%
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	115		
<b>Carbon offset contribution</b>	£95 x 30 years x 115 tCO <sub>2</sub> /year = £327,750		
<b>10% management fee</b>	£32,775		

**2 Berol Yard:**

	Residential			Non-residential		
<i>(SAP10 emission factors)</i>	Total regulated emissions (tCO <sub>2</sub> /year)	CO <sub>2</sub> savings (tCO <sub>2</sub> / year)	Percentage savings (%)	Total regulated emissions (tCO <sub>2</sub> /year)	CO <sub>2</sub> savings (tCO <sub>2</sub> /year)	Percentage savings (%)
<b>Part L 2013 Baseline</b>	205.8			33.4		
<b>Be Lean savings</b>	137.3	68.5	10.6%	27.9	5.5	16.5%
<b>Be Clean savings</b>	80.2	57	69%	21.5	6.4	19.1%
<b>Be Green savings</b>	75.3	4.9	1%	21.5	0	0%
<b>Cumulative savings</b>		75.3	81%		11.9	35.6%
<b>Carbon shortfall to</b>	39.7			21.5		

offset (tCO <sub>2</sub> )						
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**Berol House:**

	Refurbishment (non-residential)			Extension (non-residential)		
(SAP10 emission factors)	Total regulated emissions (tCO <sub>2</sub> / year)	CO <sub>2</sub> savings (tCO <sub>2</sub> / year)	Percentage savings (%)	Total regulated emissions (tCO <sub>2</sub> / year)	CO <sub>2</sub> savings (tCO <sub>2</sub> / year)	Percentage savings (%)
<b>Part L 2013 Baseline</b>	134			38.3		
<b>Be Lean savings</b>	80.4	53.6	40%	28.9	9.4	24.5%
<b>Be Clean savings</b>	34.5	19.1	34%	24.2	4.7	12.4%
<b>Be Green savings</b>	34.5	0	74%	19.3	4.9	12.8%
<b>Cumulative savings</b>		48.1	74%		19	49.7%
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	34.5			19.3		

**Energy Use Intensity / Space Heating Demand**

The Energy Use Intensity exceeds the GLA target of 35kWh/m<sup>2</sup>/year for residential and 55kWh/m<sup>2</sup>/year for the non-residential part of the development. The applicant has shown commitment to improve the values in future design stages.

Space Heating Demand for residential part of the development falls short of the GLA target of 15kWh/m<sup>2</sup>/year. For the non-residential part of the development, except Berol House refurbishment, other commercial spaces perform well against the GLA benchmark.

Building type	EUI (kWh/m <sup>2</sup> /year)		Space Heating Demand (kWh/m <sup>2</sup> /year)	Methodology used
Residential	56.5	Regulated only	20.8	SAP
Berol House Refurb	106.4	Regulated only	69.8	Part L2
Berol House Extension	50.6	Regulated only	6.9	Part L2
Berol Yard	65.6	Regulated only	10.	Part L2

**Energy – Lean**

The applicant has clarified:

- the windows to be replaced and sealed to improve the fabric efficiency and air tightness.
- the addition of the extension on top of the refurbished part of the development will remove the roof which will limit the heat transfer to the outside as the upper-level extensions will further improve the insulation.

**Energy – Clean**

The previous comments are outstanding.

**Energy – Green**

No further actions required.

**Energy – Be Seen**

No further actions required.

### **3. Carbon Offset Contribution**

A carbon shortfall of 115 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years. Applicant has confirmed to carry out the calculation in the next stage of the project programme to future proof the project.

#### Action:

- Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios. This is conditioned.

### **4. Overheating**

The assessment does not report the overheating assessment for the refurbishment and extension part of the development. The applicant has not appropriately assessed the noise and air quality constraints in relation to the overheating risk. The overheating assessment should be done with closed windows for locations where the noise pollution is a constrain. The noise impact assessment Figure 5-3 and 5-4 shows the locations near the Watermead Way to have noise levels exceeding 55dB at night. The description of the noise constraint to opening windows is provided in paragraph 3.3 in the Approved Document – O.

#### Actions:

- Please perform overheating assessment for the refurbishment and extension part of the development.
- Please remodel at the locations where noise pollution is a constraint with closed windows.

### **5. Sustainability**

No further actions required.

### **Planning Obligations Heads of Terms**

- Be Seen commitment to uploading energy data

- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations)), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.
- DEN connection (and associated obligations)
- Heating strategy fall-back option if not connecting to the DEN

The outstanding requests for information have been included within the draft conditions below.

**Planning Conditions**

To be secured if approved:

Energy strategy:

*The development hereby approved shall be constructed in accordance with the Energy Statement prepared by WSP (dated 13<sup>th</sup> June 2023) delivering a minimum 72% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network, and a minimum 31kWp solar photovoltaic (PV) array.*

*(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:*

- *Carbon reduction following the energy hierarchy for future connection to DEN and Low-carbon Plan B scenario;*
- *The applicant needs to achieve the following: (1) A combined DLF (for the offsite and onsite network) of 1.25, (2) this should assume the offsite DLF is 1.05 (and so the onsite network will have a DLF of 1.25/1/05-1/19); and (3) to certify that the combined DLF through the PCDB.*
- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*

- Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction with SAP10 carbon factors;
- Details on what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc).
- Details to reduce thermal bridging;
- Calculated Primary Energy Factor, Energy Use Intensity and space heating demand and its performance against GLA benchmarks for a similar use;
- Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;
- Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;
- Specification of any additional equipment installed to reduce carbon emissions;
- A metering strategy

*The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.*

*(b) The solar PV arrays must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.*

*(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.*

*Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.*

DEN Connection:

*Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:*

- Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.*
- Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;*
- A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;*
- Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route*

*that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;*

- Details of the route for connecting the non-residentials Berol House with the energy centre in 2 Berol Yard;*
- Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;*
- Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;*
- Details of a future pipework route from the temporary boiler location to the plant room.*

*Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.*

Overheating

*(a) Prior to the above ground commencement of the development, revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan for both new build and refurbished part of the development. This assessment shall be based on the TM52 and TM59 Overheating modelling undertaken by WSP (Energy statement dated 13<sup>th</sup> June 2023).*

*This report shall include:*

- Revised modelling of units modelled based on CIBSE TM52/59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;*
- Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O,*

*demonstrating that any risk of distribution heat losses, external shading, crime, noise and air quality issues are assessed and mitigated appropriately evidenced by the proposed location and specification of measures;*

- Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;*
- Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;*
- Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.*

*(b) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development as approved by or superseded by the latest approved Overheating Strategy.*

*If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.*

*REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy SI4 and Local Plan (2017) Policies SP4 and DM21.*

*Overheating Building User Guide*

*Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021)*

*Policy SI4 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.*

*Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.*

**BREEAM Certificates**

*(a) Prior to commencement on site, a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.*

*The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.*

*(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.*

*In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.*

*Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.*

Living roof(s)

*(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:*

- i) A roof plan identifying where the living roofs will be located;*
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate*
- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;*
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with root ball of plugs 25cm<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);*
- vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and*
- vii) Management and maintenance plan, including frequency of watering arrangements.*
- viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;*

*(b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.*

*Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*

Circular Economy (Pre-Construction report, Post-Completion report)

*Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.*

*The relevant Circular Economy Statement shall be submitted to the GLA at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development].*

*Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, S12 and S17, and Local Plan (2017) Policies SP4, SP6, and DM21.*

Whole-Life Carbon

*Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life*

*Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.*

*Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.*

*Biodiversity*

*(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.*

*(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.*

*Development shall accord with the details as approved and retained for the lifetime of the development.*

*Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*

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### Carbon Management Response 24/05/2023

In preparing this consultation response, we have reviewed:

- Energy Statement (BQ-WSP-XX-XX-ST-ES-0001-amendedtable-no\_appendix) prepared by WSP (dated 9<sup>th</sup> November 2022)
- HGY-2023-0261 Berol Quarter N17 – May response to the comments from CMT
- Whole Life Cycle Carbon Assessment prepared by WSP Rev 2 (dated 9<sup>th</sup> May 2023)
- Circular Economy Statement prepared by WSP Rev 3 (dated 17<sup>th</sup> May 2023)
- Relevant supporting documents.

#### 1. Summary

The development achieves a reduction of 66.9% carbon dioxide emissions on site, which is supported.

#### 2. Energy Strategy

The applicant has amended the carbon reduction values and shared the SAP and BRUKL sheets. The GLA's carbon emission reporting spreadsheet is missing.

#### Actions:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.

#### Energy Use Intensity / Space Heating Demand

Building type	EUI (kWh/m <sup>2</sup> /year)		Space Heating Demand (kWh/m <sup>2</sup> /year)	Methodology used

The applicant requests to share the EUI in the subsequent design stages.

Actions:

- For all sections of the development including residential, non-residential, extension and refurbishment:
  - o Provide the calculated Energy Use Intensity (excluding renewable energy) and comment on its performance against GLA benchmarks. Please submit the information in line with the above template.
  - o What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m<sup>2</sup>/year?

**Energy – Lean**

The SAP calculation for Berol House has been rerun as requested and the BRUKL sheets is submitted. The applicant has requested to condition the details of the MVHR units.

Actions:

- Refurbishments- provide more detail on the measures that will be undertaken to make the retained listed buildings more energy efficient (improving the air tightness, insulation, etc)

Overheating is dealt with in more detail below.

**Energy – Clean**

From a planning perspective, we support temporary connection to gas boilers. However, in absence of the DEN, the applicant needs to comply with Part L.

The submitted DEN connection route is supported in principle but it needs to be properly designed to consider the following:

- Detailed building entry design
- Expansion and stress – the straight N-S section may need an expansion loop
- Coordination with other buried services e.g. drainage.
- Coordination with above ground.

As the commercial units are >500m<sup>2</sup>, they should be connected to a single site wide network (i.e. Berol House should be connected to Berol Yard). They would then be indirectly connected to the DEN via 1 Berol Yard.

The applicant needs to achieve the following:

1. A combined DLF (for the offsite and onsite network) of 1.25
2. That this should assume the offsite DLF is 1.05 (and so the onsite network will have a DLF of 1.25/1/05-1/19); and
3. To certify that the combined DLF through the PCDB.

The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:

- a) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of the site (the DEN pipe will access the site in GF from Ashley Road in line with the Green link) and evidence of any obstructions in highway adjacent to connection point; please note that the pipes cannot be running through retail units where access is compromised;
- b) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106;
- c) A clear plan for QA of the network post-design approval through to operation, based on CP1;
- d) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set.

Actions:

- As the commercial units are <500m<sup>2</sup>, the non-residential space should be connected to a single site wide network. Berol House and 2 Berol Yard should also be provided with a connection to the 2 Berol Yard energy centre. Please annotate that in the plans.

**Energy – Green**

The applicant has submitted a roof layout including the solar panels, other roofs will be used as amenity spaces. A 11.17kWp for dwellings are available in SAP calculation sheets, 19.9kWp for commercial. 30 degrees, 140m<sup>2</sup> on Berol Yard and 250m<sup>2</sup> on Berol House, output of 28.7MWh annually assumed in the assessment. The applicant has agreed to amend the Solar Panel orientation to direct southward at the next design stage. A living roof has been proposed under the solar panels.

**Energy – Be Seen**

GLA Be Seen spreadsheet is submitted.

**3. Carbon Offset Contribution**

A carbon shortfall of 115 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years.

A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built. The applicant should present two carbon reduction table scenarios:

- Scenario 1: Connection to the DEN scenario (residual tCO<sub>2</sub> over 30 years)
- Scenario 2: Low-carbon alternative heating solution (residual tCO<sub>2</sub> over 30 years)

Action:

- Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios.

**4. Overheating**

The report has modelled 35 habitable rooms, 24 spaces and 2 corridors for the residential part of the development and 9 commercial spaces for the non-residential part.

Results are listed in the table below.

Residential:

	TM59 – criterion A (<3% hours	TM59 – criterion B hours	Number of habitable	Number of spaces	Number of

	of overheating)	>26°C (pass <33 hours)	rooms pass TM59	pass TM52	corridors pass
DSY1 2020s	100%	100%	35	24	2
DSY2 2020s	22%	0%	8	0	0
DSY3 2020s	11%	0%	4	0	0
DSY1 2050s	40%	0%	14	0	1
DSY1 2080s	11%	0%	4	0	0

All residential zones pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, with windows fully opening inwards
- Infiltration rate of 0.15 ACH
- Glazing g-value of 0.40
- Dedicated shading elements introduced above some windows to block out direct solar gain on the south façade.
- Inset balconies for all flats to provide amenity space and shading.
- MVHR with summer bypass (40 l/s) for corridors.
- No active cooling

Future weather files mitigation strategy:

- External shutters.
- MVHR with summer boost bypass with a rate of 8l/s.
- 5kW MVHR cooling per flat.

Non-residential:

	TM59 – criterion A (<3% hours of overheating)	TM59 – criterion B hours >26°C (pass <33 hours)	Number of habitable rooms pass TM59	Number of spaces pass TM52	Number of corridors pass
DSY1 2020s	-	100%	-	9	-
DSY2 2020s	-	100%	-	9	-
DSY3 2020s	-	100%	-	9	-
DSY1 2050s	-	100%	-	9	-
DSY1 2080s	-	100%	-	9	-

All non-residential zones pass the overheating requirements. In order to pass this, the following measures were considered:

- Part F minimum ventilation rates.
- Active cooling system, electric chiller for overheated spaces.

Heat losses from the pipework is assumed to be 2W/m<sup>2</sup> in corridors and same ventilation strategy is used for all rooms for the assessment. No significant pollution risk is identified at the time of the assessment and the applicant confirms to re-evaluate it in line with guidance during future design stages.

The area weighted non-domestic cooling demand is 45.4 MJ/m<sup>2</sup> and Total non-domestic cooling demand is 342,983 MJ/Year. The applicant confirms Berkeley Square Development/Subsequent freeholder/building management company for the BTR homes will own the overheating risk post-occupancy.

The applicant confirms to develop a heatwave/building user guide to mitigate overheating risks for the occupants.

Overheating Actions:

- Considering the poor performance in future years, external shutters should be incorporated within this design, so the building is future proofed.

**5. Sustainability**

Intensive as well as extensive green roofs, standard trees, flower rich perennial plants, unplanted detention basins, permeable paving, sealed surfaces are proposed as urban greening and biodiversity enhancement measures.

***Non-Domestic BREEAM Requirement***

Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.

The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 57.5% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of >65% could be achieved. Targeting such a low score will risk not achieving 'Very Good' as a very minimum and does not demonstrate the ambition to deliver a more sustainable development. It is recommended to aim for "excellent".

***Whole Life-Cycle Carbon Assessments***

The percentage assumption for the MEP was revised and B2-B3 were added in line with the GLA guidance. The revised total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	<b>Estimated carbon emissions</b>	<b>GLA benchmark RESIDENTIAL</b>	<b>Embodied carbon rating (Industry-wide)</b>

<b>Product &amp; Construction Stages</b> Modules A1-A5 (excl. sequestration)	414 kgCO <sub>2e</sub> /m <sup>2</sup>	Meets GLA benchmark (<850 kgCO <sub>2e</sub> /m <sup>2</sup> ) but misses the aspirational target (<500 kgCO <sub>2e</sub> /m <sup>2</sup> ).	Modules A1-A5 achieve a band rating of 'C', meeting the LETI 2020 Design Target.
<b>Use and End-Of-Life Stages</b> Modules B-C (excl. B6 and B7)	269 kgCO <sub>2e</sub> /m <sup>2</sup>	Meets GLA target (<350 kgCO <sub>2e</sub> /m <sup>2</sup> ) and aspirational benchmark (<300 kgCO <sub>2e</sub> /m <sup>2</sup> ).	
Modules A-C (excl B6, B7 and incl. sequestration)	658 kgCO <sub>2e</sub> /m <sup>2</sup>	Meets GLA target (<1200 kgCO <sub>2e</sub> /m <sup>2</sup> ) and the aspirational benchmark (<800 kgCO <sub>2e</sub> /m <sup>2</sup> ).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'A', meeting the RIBA2030 Design Target.
<b>Use and End-Of-Life Stages</b> Modules B6 and B7	461 kgCO <sub>2e</sub> /m <sup>2</sup>	N/A- This is the Modules B6 and B7 only. The End of Life Stage (C1-4) figure is reported separately and is 40 kgCO <sub>2e</sub> /m <sup>2</sup>	
<b>Reuse, Recovery, Recycling Stages</b> Module D	- 236.16kgCO <sub>2e</sub> /m <sup>2</sup>	N/A	
<u>The GLA requested further actions to be taken on whole-life carbon, which we support.</u>			
<b>Circular Economy</b>			

The GLA requested further actions to be taken on Circular Economy, which we support.

**Planning Obligations Heads of Terms**

- Be Seen commitment to uploading energy data
- Energy Plan
- Sustainability Review
- Estimated carbon offset contribution (and associated obligations)), plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO2 at the Energy Plan and Sustainability stages.
- DEN connection (and associated obligations)
- Heating strategy fall-back option if not connecting to the DEN

**Planning Conditions**

To be secured:

Energy strategy:

*The development hereby approved shall be constructed in accordance with the Energy Statement prepared by WSP (dated 9<sup>th</sup> November 2022) delivering a minimum 66.9% improvement on carbon emissions over 2013 Building Regulations Part L, with SAP10 emission factors, high fabric efficiencies, connection to the Decentralised Energy Network, and a minimum 31kWp solar photovoltaic (PV) array.*

*(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:*

- *Carbon reduction following the energy hierarchy for future connection to DEN and Low-carbon Plan B scenario;*
- *The applicant needs to achieve the following: (1) A combined DLF (for the offsite and onsite network) of 1.25, (2) this should assume the offsite DLF is 1.05 (and so the onsite network will have a DLF of 1.25/1/05-1/19); and (3) to certify that the combined DLF through the PCDB.*
- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*

- *Confirmation of the necessary fabric efficiencies to achieve a minimum 10% reduction with SAP10 carbon factors;*
- *Details on what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc).*
- *Details to reduce thermal bridging;*
- *Calculated Primary Energy Factor, Energy Use Intensity and space heating demand and its performance against GLA benchmarks for a similar use; submit the GLA's Carbon Emission Reporting Spreadsheet;*
- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;*
- *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp); and how the energy will be used on-site before exporting to the grid;*
- *Specification of any additional equipment installed to reduce carbon emissions;*
- *A metering strategy*

*The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.*

*(b) The solar PV arrays must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.*

*(c) Within six months of first occupation, evidence shall be submitted to the Local Planning Authority that the development has been registered on the GLA's Be Seen energy monitoring platform.*

*Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.*

DEN Connection:

*Prior to the above ground commencement of construction work, details relating to the future connection to the DEN must be submitted to and approved by the local planning authority. This shall include:*

- Further detail of how the developer will ensure the performance of the DEN system will be safeguarded through later stages of design (e.g. value engineering proposals by installers), construction and commissioning including provision of key information on system performance required by CoP1 (e.g. joint weld and HIU commissioning certificates, CoP1 checklists, etc.);*
- Peak heat load calculations in accordance with CIBSE CP1 Heat Networks: Code of Practice for the UK (2020) taking account of diversification.*
- Detail of the pipe design, pipe sizes and lengths (taking account of flow and return temperatures and diversification), insulation and calculated heat loss from the pipes in Watts, demonstrating heat losses have been minimised together with analysis of stress/expansion;*
- A before and after floor plan showing how the plant room can accommodate a heat substation for future DEN connection. The heat substation shall be sized to meet the peak heat load of the site. The drawings should cover details of the phasing including any plant that needs to be removed or relocated and access routes for installation of the heat substation;*
- Details of the route for the primary pipework from the energy centre to a point of connection at the site boundary including evidence that the point of connection is accessible by the area wide DEN, detailed proposals for installation for the route*

*that shall be coordinated with existing and services, and plans and sections showing the route for three 100mm diameter communications ducts;*

- *Details of the route for connecting the non-residential Berol House with the energy centre in 2 Berol Yard;*
- *Details of the location for building entry including dimensions, isolation points, coordination with existing services and detail of flushing/seals;*
- *Details of the location for the set down of a temporary plant to provide heat to the development in case of an interruption to the DEN supply including confirmation that the structural load bearing of the temporary boiler location is adequate for the temporary plant and identify the area/route available for a flue;*
- *Details of a future pipework route from the temporary boiler location to the plant room.*

*Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2 and SI3, and Local Plan (2017) Policies SP4 and DM22.*

#### Overheating

*Prior to the above ground commencement of the development, revised Overheating Report shall be submitted to and approved by the Local Planning Authority. The submission shall assess the overheating risk and propose a retrofit plan. This assessment shall be based on the TM52 and TM59 Overheating modelling undertaken by WSP (Energy statement dated 9<sup>th</sup> November 2022).*

*This report shall include:*

- *Revised modelling of units modelled based on CIBSE TM52/59, using the CIBSE TM49 London Weather Centre files for the DSY1-3 (2020s) and DSY1 2050s and 2080s, high emissions, 50% percentile;*
- *Demonstrating the mandatory pass for DSY1 2020s can be achieved following the Cooling Hierarchy and in compliance with Building Regulations Part O, demonstrating that any risk of distribution heat losses, external shading, crime,*

*noise and air quality issues are assessed and mitigated appropriately evidenced by the proposed location and specification of measures;*

- *Modelling of mitigation measures required to pass future weather files, clearly setting out which measures will be delivered before occupation and which measures will form part of the retrofit plan;*
- *Confirmation that the retrofit measures can be integrated within the design (e.g., if there is space for pipework to allow the retrofitting of cooling and ventilation equipment), setting out mitigation measures in line with the Cooling Hierarchy;*
- *Confirmation who will be responsible to mitigate the overheating risk once the development is occupied.*

*(b) Prior to occupation of the development, details of internal blinds to all habitable rooms must be submitted for approval by the local planning authority. This should include the fixing mechanism, specification of the blinds, shading coefficient, etc. Occupiers must retain internal blinds for the lifetime of the development, or replace the blinds with equivalent or better shading coefficient specifications.*

*(c) Prior to occupation, the development must be built in accordance with the approved overheating measures and retained thereafter for the lifetime of the development:*

- *Natural ventilation with fully inward openable windows;*
- *Infiltration rate of 0.15 ACH*
- *Window g-values of 0.4;*
- *Mechanical ventilation with summer bypass (40l/s);*
- *Hot water pipes insulated to high standards.*
- *Any further mitigation measures including external shutters, as approved by or superseded by the latest approved Overheating Strategy.*

*If the design of Blocks is amended, or the heat network pipes will result in higher heat losses and will impact on the overheating risk of any units, a revised Overheating Strategy must be submitted as part of the amendment application.*

*REASON: In the interest of reducing the impacts of climate change, to enable the Local Planning Authority to assess overheating risk and to ensure that any necessary mitigation measures are implemented prior to construction, and maintained, in accordance with London Plan (2021) Policy S14 and Local Plan (2017) Policies SP4 and DM21.*

Overheating Building User Guide

*Prior to occupation of the residential dwellings, a Building User Guide for new residential occupants shall be submitted in writing to and for approval by the Local Planning Authority. The Building User Guide will advise residents how to operate their property during a heatwave, setting out a cooling hierarchy in accordance with London Plan (2021) Policy S14 with passive measures being considered ahead of cooling systems. The Building User Guide will be issued to residential occupants upon first occupation.*

*Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy S14, and Local Plan (2017) Policies SP4 and DM21.*

BREEAM Certificates

*(a) Prior to commencement on site, a design stage accreditation certificate for every type of non-residential category must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.*

*The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.*

*(b) Prior to occupation, a post-construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.*

*In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority's approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.*

*Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.*

Living roof(s)

*(a) Prior to the above ground commencement of development, details of the living roofs must be submitted to and approved in writing by the Local Planning Authority. Living roofs must be planted with flowering species that provide amenity and biodiversity value at different times of year. Plants must be grown and sourced from the UK and all soils and compost used must be peat-free, to reduce the impact on climate change. The submission shall include:*

- i) A roof plan identifying where the living roofs will be located;*
- ii) A section demonstrating settled substrate levels of no less than 120mm for extensive living roofs (varying depths of 120-180mm), and no less than 250mm for intensive living roofs (including planters on amenity roof terraces);*
- iii) Roof plans annotating details of the substrate: showing at least two substrate types across the roofs, annotating contours of the varying depths of substrate*
- iv) Details of the proposed type of invertebrate habitat structures with a minimum of one feature per 30m<sup>2</sup> of living roof: substrate mounds and 0.5m high sandy piles in areas with the greatest structural support to provide a variation in habitat; semi-buried log piles / flat stones for invertebrates with a minimum footprint of 1m<sup>2</sup>, rope coils, pebble mounds of water trays;*
- v) Details on the range and seed spread of native species of (wild)flowers and herbs (minimum 10g/m<sup>2</sup>) and density of plug plants planted (minimum 20/m<sup>2</sup> with root ball of plugs 25cm<sup>3</sup>) to benefit native wildlife, suitable for the amount of direct*

*sunshine/shading of the different living roof spaces. The living roofs will not rely on one species of plant life such as Sedum (which are not native);*

*vi) Roof plans and sections showing the relationship between the living roof areas and photovoltaic array; and*

*vii) Management and maintenance plan, including frequency of watering arrangements.*

*viii) A section showing the build-up of the blue roofs and confirmation of the water attenuation properties, and feasibility of collecting the rainwater and using this on site;*

*(b) Prior to the occupation of 90% of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roofs have been delivered in line with the details set out in point (a). This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roofs have not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roofs shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.*

*Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*

*Circular Economy (Pre-Construction report, Post-Completion report)*

*Prior to the occupation [of any phase / building/ development], a Post-Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance.*

*The relevant Circular Economy Statement shall be submitted to the GLA at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk), along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved*

*in writing by, the Local Planning Authority, prior to the occupation [of any phase / building/ development.*

*Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with London Plan (2021) Policies D3, SI2 and SI7, and Local Plan (2017) Policies SP4, SP6, and DM21.*

Whole-Life Carbon

*Prior to the occupation of each building, the post-construction tab of the GLA's Whole Life Carbon Assessment template should be completed in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage. This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the relevant building.*

*Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM21.*

Biodiversity

*(a) Prior to the commencement of development, details of ecological enhancement measures and ecological protection measures shall be submitted to and approved in writing by the Council. This shall detail the biodiversity net gain, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats.*

*(b) Prior to the occupation of development, photographic evidence and a post-development ecological field survey and impact assessment shall be submitted to and approved by the Local Planning Authority to demonstrate the delivery of the ecological*

*enhancement and protection measures is in accordance with the approved measures and in accordance with CIEEM standards.*

*Development shall accord with the details as approved and retained for the lifetime of the development.*

*Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.*

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### **Carbon Management Response 16/05/2023**

In preparing this consultation response, we have reviewed:

- Energy Statement prepared by WSP (dated 9<sup>th</sup> November 2022)
- Sustainability Statement prepared by WSP (dated November 2022)
- Whole Life Cycle Carbon Assessment prepared by WSP (dated 8<sup>th</sup> November 2022)
- Circular Economy Statement prepared by WSP (dated 5<sup>th</sup> December 2022)
- Relevant supporting documents.

#### **1. Summary**

The development achieves a reduction of 66.9% carbon dioxide emissions on site, which is supported in principle. Some clarifications must be provided with regard to the Energy Strategy, and Overheating Strategy. Appropriate planning conditions will be recommended once this information has been provided.

#### **2. Energy Strategy**

Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2013). The London Plan (2021) further confirms this in Policy SI2.

The overall predicted reduction in CO<sub>2</sub> emissions for the development shows an improvement of approximately 66.9% in carbon emissions with SAP10 carbon factors, from the Baseline development model (which is Part L 2013 compliant). This represents an annual saving of approximately 232.2 tonnes of CO<sub>2</sub> from a baseline of 347.2 tCO<sub>2</sub>/year.

London Plan Policy SI2 requires major development proposals to calculate and minimise unregulated carbon emissions, not covered by Building Regulations. The calculated unregulated emissions are: 233.5/233.9 tCO<sub>2</sub>.

<i>Site-wide (SAP10 emission factors)</i>			
	<b>Total regulated emissions (Tonnes CO<sub>2</sub> / year)</b>	<b>CO<sub>2</sub> savings (Tonnes CO<sub>2</sub> / year)</b>	<b>Percentage savings (%)</b>
<b>Part L 2013 Baseline</b>	347.2		
<b>Be Lean</b>	289.7	57.5	16.6%
<b>Be Clean</b>	121.7	168	48.4%
<b>Be Green</b>	115	6.7	1.9%
<b>Cumulative savings</b>		232.2	66.9%
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	115		
<b>Carbon offset contribution</b>	£95 x 30 years x 115 tCO <sub>2</sub> /year = £327,750		
<b>10% management fee</b>	£32,775		

**2 Berol Yard:**

	Residential			Non-residential		
<i>(SAP10 emission factors)</i>	Total regulated emissions (tCO <sub>2</sub> /year)	CO <sub>2</sub> savings (tCO <sub>2</sub> / year)	Percentage savings (%)	Total regulated emissions (tCO <sub>2</sub> /year)	CO <sub>2</sub> savings (tCO <sub>2</sub> /year)	Percentage savings (%)
<b>Part L 2013 Baseline</b>	206.6			33.4		
<b>Be Lean savings</b>	184.8	21.8	10.6%	27.9	5.5	16.5%
<b>Be Clean savings</b>	41.5	143.3	69.3%	21.5	6.4	19.1%
<b>Be Green savings</b>	39.7	1.8	0.9%	21.5	0	0%
<b>Cumulative savings</b>		166.9	80.8%		65.2	35.6%
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	39.7			21.5		

**Berol House:**

	Refurbishment (non-residential)			Extension (non-residential)		
<i>(SAP10 emission factors)</i>	Total regulated emissions (tCO <sub>2</sub> /year)	CO <sub>2</sub> savings (tCO <sub>2</sub> / year)	Percentage savings (%)	Total regulated emissions (tCO <sub>2</sub> /year)	CO <sub>2</sub> savings (tCO <sub>2</sub> /year)	Percentage savings (%)

<b>Part L 2013 Baseline</b>	68.8			38.3		
<b>Be Lean savings</b>	48.1	20.7	30.1%	28.9	9.4	24.5%
<b>Be Clean savings</b>	34.5	27.4	19.7%	24.2	4.7	12.4%
<b>Be Green savings</b>	34.5	0	0%	19.3	4.9	12.8%
<b>Cumulative savings</b>		48.1	49.8%		19	49.7%
<b>Carbon shortfall to offset (tCO<sub>2</sub>)</b>	34.5			19.3		

Actions:

- The carbon reduction values for non-residential part- 2 Berol Yard, is inconsistent throughout the report ref. Table 5-5, 7-2, 8-3. Please amend and re-submit the energy report.
- Please submit the GLA's Carbon Emission Reporting Spreadsheet.
- Please justify how you have you modelled all representative dwelling type to capture all proposed dwelling types. Please submit SAP and BRUKL sheets for a representative selection of the development for the Baseline, Be Lean and Be Green scenarios.
- What is the calculated Primary Energy Factor?

**Energy Use Intensity / Space Heating Demand**

Applications are required to report on the total Energy Use Intensity and Space Heating Demand, in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed

annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

Building type	EUI (kWh/m <sup>2</sup> /year)	Space Heating Demand (kWh/m <sup>2</sup> /year)	Methodology used

**Actions:**

- For all sections of the development including residential, non-residential, extension and refurbishment:
  - o What is the calculated Energy Use Intensity (excluding renewable energy)? How does this perform against GLA benchmarks, i.e. at 35(resi), 65(school), 55(Office/Hotel) kWh/m<sup>2</sup>/year? Please submit the information in line with the GLA’s reporting template.
  - o What is the calculated space heating demand? How does this perform against the GLA benchmark of 15 kWh/m<sup>2</sup>/year? Please submit the information in line with the GLA’s reporting template.

**Energy – Lean**

The applicant has proposed a saving of 57.5 tCO<sub>2</sub> in carbon emissions (17%) through improved energy efficiency standards in key elements of the build, based on SAP10 carbon factors. This goes beyond the minimum 10% and 15% reduction respectively set in London Plan Policy SI2, so this is supported.

The following u-values, g-values and air tightness are proposed:

**New Build: 2 Berol Yard**

	Residential	Commercial
Floor u-value	0.10 W/m <sup>2</sup> K	0.11 W/m <sup>2</sup> K
External wall u-value	0.15 W/m <sup>2</sup> K	0.13 W/m <sup>2</sup> K
Roof u-value	0.12 W/m <sup>2</sup> K	0.11 W/m <sup>2</sup> K

Door u-value	1.00 W/m <sup>2</sup> K	1.00 W/m <sup>2</sup> K
Window u-value	1.00 W/m <sup>2</sup> K	1.00 W/m <sup>2</sup> K
G-value	0.40	0.40
Air permeability rate	3 m <sup>3</sup> /hm <sup>2</sup> @ 50Pa	3 m <sup>3</sup> /hm <sup>2</sup> @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 90% efficiency; 0.5 W/l/s Specific Fan Power)	Mechanical ventilation with heat recovery (MVHR 91% efficiency; 1.5 W/l/s Specific Fan Power)
Thermal bridging	Approved junction details	Default
Low energy lighting	100%	100%
Heating system (efficiency / emitter) Baseline only	93% gas boiler, radiators	Gas Boiler with 91%, fan coil units
Thermal mass	Medium	Medium
Improvement from the target fabric energy efficiency (TFEE)	15% improvement, from 43 to 36.6 kWh/year	N/A

Refurbishment and Extension: Berol House

	Refurbishment	Extension
Floor u-value	0.57 W/m <sup>2</sup> K	0.13 W/m <sup>2</sup> K
External wall u-value	1.72 W/m <sup>2</sup> K	0.13 W/m <sup>2</sup> K
Roof u-value	2.94 W/m <sup>2</sup> K	0.11 W/m <sup>2</sup> K
Door u-value	1.00 W/m <sup>2</sup> K	1.00 W/m <sup>2</sup> K
Window u-value	1.00 W/m <sup>2</sup> K	1.00 W/m <sup>2</sup> K
G-value	0.4	0.4
Air permeability rate	25 m <sup>3</sup> /hm <sup>2</sup> @ 50Pa	3 m <sup>3</sup> /hm <sup>2</sup> @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery (MVHR 91%	Mechanical ventilation with heat recovery

	efficiency; 1.5 W/l/s Specific Fan Power)	(MVHR 91% efficiency; 1.5 W/l/s Specific Fan Power)
Low energy lighting	100%	100%
Heating system (efficiency / emitter) Be Lean only	200% with Fan Coil Units	Gas boiler 91% with Fan Coil Units
Thermal mass	Medium	Medium

Actions:

- Please clarify why 200% efficiency has been used for the heating system within the refurbished building for baseline and be lean calculation. A gas boiler with 84% efficiency should be used.
- Please identify on a plan where the MVHR units will be located within the dwellings. The units should be less than 2m away from external walls. This detail can also be conditioned.
- What is the proportion of glazed area? Consider following the LETI Climate Emergency Design Guide principles in façade design.
- Set out how the scheme's thermal bridging will be reduced. [if below 0.15, check how/why]. No measures are proposed to reduce heat loss from junction details, and it does not set out what the proposed Psi ( $\Psi$ ) value is.
- Commercial including new build, and extension.
  - o Submit the individual end use BER for specific end users in line w CIBSE Guide F.
- Refurbishments
  - o Detail what measures will be undertaken to make the retained listed buildings more energy efficient (what type of insulation, how the building will be made more airtight, etc).

Overheating is dealt with in more detail below.

**Energy – Clean**

London Plan Policy SI3 calls for major development in Heat Network Priority Areas to have a communal low-temperature heating system, with the heat source selected from a hierarchy of options (with connecting to a local existing or planned heat network at the top). Policy DM22 of the Development Management Document supports proposals that contribute to the provision and use of Decentralised Energy Network (DEN) infrastructure. It requires developments incorporating site-wide communal energy systems to examine opportunities to extend these systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. It requires developments to prioritise connection to existing or planned future DENs.

The Be Clean strategy to connect to the DEN in Tottenham Hale is supported. However, an alternative strategy should be reported in case the DEN does not proceed or is costly. Some evidence should be provided that the DEN system was inputted into the SAP model and that the plant room is adequately sized for a substation.

The proposed heating plant room is on a mezzanine on the north side of the building. The DEN pipe will access the site from Ashley Road in line with the Green Link - Ideally this would be

- on the south side of the building
- on the GF

The applicant shall install a pipe from the edge of the site to the substation room at their cost (the route to be approved by the council and make sure it is not running through retail units where access is compromised) and so the heating plant room being on the north side is less of an issue.

However, it is important that the heating plant is in the GH. The specification of the connection should comply with our specification which will ensure suitable access and will also secure a point of connection for emergency plant and several other things.

The applicant will need to demonstrate that they will provide the following details prior to the commencement of construction:

- e) Buried pipe (dry and filled with nitrogen) to our specification from the GF plant room to a manhole at the boundary of the site (the DEN pipe will access the site in GF from Ashley Road in line with the Green link) and evidence of any obstructions in highway adjacent to connection point; please note that the pipes cannot be running through retail units where access is compromised;
- f) A good quality network within the building – 60/40 F&R, <50W/dwelling losses from the network – ideally to an agreed standard in the S106;
- g) A clear plan for QA of the network post-design approval through to operation, based on CP1;
- h) A clear commercial strategy identifying who will sell energy to residents and how prices/quality of service will be set.

Actions:

- Please submit an alternative low-carbon strategy in case DEN doesn't proceed. A communal ASHP on the roof could be explored. This can include provisions to amend the scheme during construction if it were not required.
- The non-residential space in Berol House and 2 Berol Yard should also be provided with a connection to the 2 Berol Yard energy centre. Please annotate that in the plans.
- The report quotes two distribution loss factor (DLF) 1.2 and 1.3. Please amend this with a consistent value. A DLF of 1.25 would represent the combined DLF of DEN and the secondary network.

**Energy – Green**

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The application has reviewed the installation of various renewable technologies. The report concludes that only solar photovoltaic (PV) is suitable for the proposed development with the district heat network in place to deliver the Be Green requirement. A total of 6.7tCO<sub>2</sub> (1.9%) reduction of emissions are proposed under Be Green measures.

The proposed roof mounted PV array would cover an area of 140m<sup>2</sup> and 250m<sup>2</sup> on the roof of 2 Berol Yard and Herol House respectively.

Actions:

- Please provide some commentary on how the available roof space has been maximised to install solar PV. Has your feasibility shown that other roofs will not be viable / will they be used for other purposes?
- Please provide a detailed roof layout including the solar panels.
- Please provide the capacity (kWp), total net area (m<sup>2</sup>) and annual output (kWh), assumed efficiency, angle and orientation of the proposed PV array.?
- Why has a SE/SW orientation been assumed for PV when the plan below shows that the blocks have a direct southern orientation?
- A living roof should be installed under the solar PV, or if this is not feasible, the roof should be light coloured to reduce solar heat gains and the improve efficiency of the solar panels.

**Energy – Be Seen**

London Plan Policy SI2 requests all developments to ‘be seen’, to monitor, verify and report on energy performance. The GLA requires all major development proposals to report on their modelled and measured operational energy performance. This will improve transparency on energy usage on sites, reduce the performance gap between modelled and measured energy use, and provide the applicant, building managers and occupants clarity on the performance of the building, equipment and renewable energy technologies.

A public display of energy usage and generation should also be provided in the main entrance area to raise awareness of residents and businesses.

Action:

- Demonstrate that the planning stage energy performance data has been submitted to the GLA webform for this development: (<https://www.london.gov.uk/what-we->

[do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform\)](#)

### 3. Carbon Offset Contribution

A carbon shortfall of 115 tCO<sub>2</sub>/year remains. The remaining carbon emissions will need to be offset at £95/tCO<sub>2</sub> over 30 years.

A deferred carbon offset contribution mechanism will apply to this scheme as it is expected to connect to the DEN when this has been built.

The applicant should present two carbon reduction table scenarios:

- Scenario 1: Connection to the DEN scenario (residual tCO<sub>2</sub> over 30 years)
- Scenario 2: Low-carbon alternative heating solution (residual tCO<sub>2</sub> over 30 years)

#### Action:

- Energy modelling of the two scenarios is needed to calculate the deferred carbon offset contribution. Please provide the energy modelling for these scenarios.

### 4. Overheating

London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems. Through careful design, layout, orientation, materials and incorporation of green infrastructure, designs must reduce overheating in line with the Cooling Hierarchy.

In accordance with the Energy Assessment Guidance, the applicant has undertaken a dynamic thermal modelling assessment in line with CIBSE TM59 for residential and TM52 for non-residential with TM49 weather files (London Weather Centre), and the cooling hierarchy has been followed in the design. It is unclear how many habitable rooms, homes/spaces and corridors have been modelled.

Results are listed in the table below.

Residential:

	<b>TM59 – criterion A (&lt;3% hours of overheating)</b>	<b>TM59 – criterion B hours &gt;26°C (pass &lt;33 hours)</b>	<b>Number of habitable rooms pass TM59</b>	<b>Number of spaces pass TM52</b>	<b>Number of corridors pass</b>
DSY1 2020s	100%	100%			
DSY2 2020s	6%	6%			
DSY3 2020s	3%	3%			
DSY1 2050s	9%	9%			
DSY1 2080s	3%	3%			

All residential zones pass the overheating requirements for 2020s DSY1. In order to pass this, the following measures will be built:

- Natural ventilation, with windows fully opening inwards
- Infiltration rate of 0.15 ACH
- Glazing g-value of 0.40
- Dedicated shading elements introduced above some windows to block out direct solar gain on the south façade.
- Inset balconies for all flats to provide amenity space and shading.
- MVHR with summer bypass (40 l/s) for corridors.
- No active cooling

Future weather files mitigation strategy:

- External shutters.
- MVHR with summer boost bypass with a rate of 8l/s.

- 5kW MVHR cooling per flat.

Non-residential:

	<b>TM59 – criterion A (&lt;3% hours of overheating)</b>	<b>TM59 – criterion B hours &gt;26°C (pass &lt;33 hours)</b>	<b>Number of habitable rooms pass TM59</b>	<b>Number of spaces pass TM52</b>	<b>Number of corridors pass</b>
DSY1 2020s	100%	100%			
DSY2 2020s	100%	100%			
DSY3 2020s	100%	100%			
DSY1 2050s	100%	100%			
DSY1 2080s	100%	100%			

All non-residential zones pass the overheating requirements. In order to pass this, the following measures were considered:

- Part F minimum ventilation rates.
- Active cooling system, electric chiller for overheated spaces.

Overheating Actions:

- It is unclear how many habitable rooms, homes/spaces and corridors have been modelled and how many of them pass against the criteria. Report the results for all rooms, spaces, and corridors in a table that is colour coded and clearly sets out the maximum hours above criteria A and B in order to pass the requirement, and a summary of the number of rooms/spaces that pass.

	<ul style="list-style-type: none"> <li>- Please perform overheating assessment for the refurbishment and extension part of the development.</li> <li>- Set out the heat losses from pipework and heat interface units for community heating systems.</li> <li>- Properly clarify which rooms have been modelled.</li> <li>- Show which habitable spaces will be predominantly naturally ventilated or mechanically ventilated in the floor plans.</li> <li>- Confirm that the habitable rooms facing the main road are not subject to adverse noise or air pollution. Specify the strategy to overcome any risk of crime or adverse air/noise pollution that will impact whether occupants can rely on natural ventilation, in line with the AVO Residential Design Guide. This should include specification of adapted windows and elevations demonstrating where these will be installed.</li> <li>- Considering the poor performance in future years, external shutters should be incorporated within this design, so the building is future proofed.</li> <li>- Please confirm and if not modelled undertake further modelling for new build, extension and refurbished part of the development. Then, report for all rooms and spaces for the following: <ul style="list-style-type: none"> <li>o Model the 2020s DSY 2 and 3 and DSY1 for the 2050s and 20280s. Ensure the design has incorporated as many mitigation measures to pass these more extreme and future weather files as far as feasible. Any remaining overheating risk should inform the future retrofit plan.</li> <li>o All single-aspect rooms facing west, east, and south;</li> <li>o At least 50% of rooms on the top floor;</li> <li>o 75% of all modelled rooms facing South or South/West;</li> <li>o Rooms closest to any significant noise and / or air pollution source, with windows closed at all times (with cross reference to the Noise and the Air Quality Assessments to demonstrate the most sensitive receptors and the <u>AVO Residential Design Guide</u>);</li> <li>o Habitable communal spaces;</li> <li>o Communal corridors, where pipework runs through;</li> </ul> </li> </ul>	
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- Commercial/office areas, particularly where they will be occupied for a longer period of time. Assuming that active cooling will be provided is not sufficient. If the proposed uses are not yet clear, this aspect can be conditioned to ensure that the modelling is based on the potential future occupiers.;
- Specify the active cooling demand (space cooling, not energy used) on an area-weighted average in MJ/m<sup>2</sup> and MY/year? Please also confirm the efficiency of the equipment, whether the air is sourced from the coolest point or any renewable sources.
- Confirm who will own the overheating risk when the building is occupied (not the residents).
- This development should have a heatwave plan/building user guide to mitigate overheating risk for occupants.

**5. Sustainability**

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques. The sustainability section in the report sets out the proposed measures to improve the sustainability of the scheme, including transport and access, materials and waste, water consumption, flood risk and drainage, biodiversity, climate resilience, energy, CO<sub>2</sub> emission and pollution management.

Action:

- Set out what urban greening and biodiversity enhancement measures will be proposed (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.)
- What electric vehicle charging points are proposed? This allows the future-proofing of the dwelling/development by ensuring the required power has been installed.

***Non-Domestic BREEAM Requirement***

Policy SP4 requires all new non-residential developments to achieve a BREEAM rating 'Very Good' (or equivalent), although developments should aim to achieve 'Excellent' where achievable.

The applicant has prepared a BREEAM Pre-Assessment Report for the commercial units. Based on this report, a score of 57.5% is expected to be achieved, equivalent to 'Very Good' rating. A potential score of >65% could be achieved. Targeting such a low score will risk not achieving 'Very Good' as a very minimum and does not demonstrate the ambition to deliver a more sustainable development.

Actions:

- The submitted score is not good enough and a potential score of more than 65% could be achieved. Please explore ways achieve this and re-submit the BREEAM pre-assessment report.
- Submit the BREEAM pre-assessment for refurbishment and extension too.
- Along with the graph, a table should be submitted to demonstrate which credits will be met, how many are met out of the total available, under which category, which could be achieved and which will not be met. This needs to include justification where targets are not met or 'potential' credits (where they are available under the Shell and Core assessment). This will enable better assessment of which credits.

***Urban Greening / Biodiversity***

All development sites must incorporate urban greening within their fundamental design and submit an Urban Greening Factor Statement, in line with London Plan Policy G5. London Plan Policy G6 and Local Plan Policy DM21 require proposals to manage impacts on biodiversity and aim to secure a biodiversity net gain. Additional greening should be provided through high-quality, durable measures that contribute to London's biodiversity and mitigate the urban heat island impact. This should include tree planting, shrubs, hedges, living roofs, and urban food growing. Specifically, living roofs and walls are encouraged in the London Plan. Amongst other benefits, these will increase biodiversity and reduce surface water runoff.

The development achieves an Urban Greening Factor of 0.32, which complies with the interim minimum target of 0.3 for predominantly non-residential developments in London Plan Policy G5.

**Living roofs**

All development sites must incorporate urban greening within their fundamental design, in line with London Plan Policy G5.

The development is proposing living roofs in the development. All landscaping proposals and living roofs should stimulate a variety of planting species. Mat-based, sedum systems are discouraged as they retain less rainfall and deliver limited biodiversity advantages. The growing medium for extensive roofs must be 120-150mm deep, and at least 250mm deep for intensive roofs (these are often roof-level amenity spaces) to ensure most plant species can establish and thrive and can withstand periods of drought. Living walls should be rooted in the ground with sufficient substrate depth.

Living roofs are supported in principle, subject to detailed design. Details for living roofs will need to be submitted as part of a planning condition.

**Whole Life-Cycle Carbon Assessments**

Policy SI2 requires developments referable to the Mayor of London to submit a Whole Life-Cycle Carbon Assessment and demonstrate actions undertaken to reduce life-cycle emissions.

The total calculated emissions based on the GIA (without grid decarbonisation) is estimated at:

	<b>Estimated carbon emissions</b>	<b>GLA benchmark RESIDENTIAL</b>	<b>Embodied carbon rating (Industry-wide)</b>
<b>Product &amp; Construction</b>	495 kgCO <sub>2</sub> e/m <sup>2</sup>	Meets GLA benchmark (<850 kgCO <sub>2</sub> e/m <sup>2</sup> ) but	Modules A1-A5 achieve a band

	<b>Stages</b> Modules A1-A5 (excl. sequestration)		misses the aspirational target (<500 kgCO <sub>2e</sub> /m <sup>2</sup> ).	rating of 'C', meeting the LETI 2020 Design Target.
	<b>Use and End-Of-Life Stages</b> Modules B-C (excl. B6 and B7)	377 kgCO <sub>2e</sub> /m <sup>2</sup>	Does not meet GLA target (<350 kgCO <sub>2e</sub> /m <sup>2</sup> ) and aspirational benchmark (<300 kgCO <sub>2e</sub> /m <sup>2</sup> ).	
	Modules A-C (excl B6, B7 and incl. sequestration)	846 kgCO <sub>2e</sub> /m <sup>2</sup>	Meets GLA target (<1200 kgCO <sub>2e</sub> /m <sup>2</sup> ) and the aspirational benchmark (<800 kgCO <sub>2e</sub> /m <sup>2</sup> ).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'C', not meeting the LETI2020 Design Target.
	<b>Use and End-Of-Life Stages</b> Modules B6 and B7	1046kgCO <sub>2e</sub> /m <sup>2</sup>	N/A	
	<b>Reuse, Recovery, Recycling Stages</b> Module D	- 245.3kgCO <sub>2e</sub> /m <sup>2</sup>	N/A	
<p>The largest contributor to the building's WLC are the A1-A3 materials, accounting for approximately 53% of emissions. The majority of A1-A3 emissions are associated with the concrete, structural steel and rebar. Material replacement (B4) was the second largest contributor with 35.7% WLC emissions. A number of areas have been identified to</p>				

calculate more accurately and opportunities to reduce the embodied carbon of the buildings.

Actions:

- Please take necessary actions to meet the GLA embodied carbon targets. Potentially through pre-commencement condition
- The GLA requested further actions to be taken on whole-life carbon, which we support.

***Circular Economy***

Policy SI7 requires applications referable to the Mayor of London to submit a Circular Economy Statement demonstrating how it promotes a circular economy within the design and aim to be net zero waste. Haringey Policy SP6 requires developments to seek to minimise waste creation and increase recycling rates, address waste as a resource and requires major applications to submit Site Waste Management Plans.

The principles used for this development are:

- Building in layers- ensuring that different parts of the building are accessible and can be maintained and replaced where necessary.
- Design out waste
- Designing for longevity, circa 50 years of building life, and disassembly at end of life
- Designing for flexibility and adaptability
- Minimise operational waste and provide adequate space for recycling

The circular economy statement includes Bills of Materials (Appendix A), Pre-redevelopment audit (Appendix B), Operational Waste Management (Appendix C), and Lean Design Options and Design for disassembly (Appendix D). This is a fairly high level of information, and the applicant expects this to become more detailed as the detailed design progresses following permission.

The GLA requested further actions to be taken on Circular Economy, which we support.

<p>LBH Conservation Officer</p>	<p>The proposed development comprising the refurbishment and extension of locally listed Berol House and the erection of an adjacent new building at 2 Berol Yard, sits in the south-eastern corner of the Ashley Road South Master Plan.</p> <p>The Hale has been over the last years a fast-changing part of the borough defined to the east by the River Lea valley with its open landscape, walkways, recreation spaces and wetland, and is bound to the west by Markfield park and the historic urban corridor of Tottenham High Road.</p> <p>The townscape character of the Hale has been so far very fragmented and has been defined by surviving Victorian and Edwardian residential streets, post-war estates, later infill developments, industrial and business buildings, railway line, now gradually complemented by emerging new high-rise developments that, together with their new private and public spaces and landscape design, are progressively reconfiguring this eastern part of the borough.</p> <p>Compatibly with the local interest of Berol House as industrial heritage, and its low susceptibility to change, alterations to the locally listed building and fundamental change to its setting have been accepted in principle as part of the much needed regeneration of the area, and accordingly, a two storey extension to Berol House, as well as redevelopment of the site at 2 Berol Yard, were previously consented together with the recently completed Gessner development and other emerging tall buildings which are contributing to the new, contemporary and more enclosed character of the area.</p> <p>Within this frame, the proposed refurbishment and three storey roof extension to Berol House, to provide office uses and an external terrace, constitutes an opportunity to sustainably retain, enhance and put into beneficial use the locally listed building while carefully reconfiguring it within its emerging new context. The building will be provided with new entrances and new internal route at ground level to improve permeability and will host retail and commercial uses at ground and first floor thus offering a more active frontage to Ashley Road.</p>	<p>Comments noted.</p>

The proposed additional two storeys will be sympathetically clad in terracotta tiles with dark power coated frames and detailing and will be crowned by a further, setback, top floor with double glazed curtain walling that will positively complement and improve the design of the host building and will sustain its use.

The extended Berol House will be adjoined to the east, where there is currently a car park, by the new 30 storey development at 2 Berol Yard which includes residential uses, community and indoor amenity space with a podium garden, retail ground level to the south and west sides, whereas car and cycle parking and landscaping will complement the north and east sides of the site.

The urban regeneration of this area will rest on a careful and integrated reconfiguration of buildings and places, such as the new pedestrian link 'Berol Walk' with trees connecting Berol House and 2 Berol Yard with The Gessner and One Ashley Road, or the new 'Gessner Lane' to the north, or the new public space designed to the south of Berol House and 2 Berol Yard that will host a winter garden until when it will connect in the future to a bridge link across Watermead Way as part of the masterplan aspiration to connect the Lea valley and Tottenham High Road.

The mass and forms of 2 Berol Yard have been carefully articulated and will gradually step up in height in such a way to address its local and wider context and while including a podium garden fronting Watermead Way and Gessner Lane, plus further amenity space on the upper floors and roof level.

The proposed scheme will altogether contribute to define the new urban character of the area through both the creation of a tall building on the existing car park backing Berol House and by conserving the built memory of the historic industrial use of the area as exemplified by Berol house. The re-design and extension of Berol House respects and complements the industrial heritage character of the host building while providing distinctive and well- composed improvements to the host building. The new building at 2 Berol Yard building would successfully complement both the existing and emerging

context through its articulated elevations, materials and variations in height that would help to break up the scale and form of the building and would frame, together with Berol House, new public spaces, and pedestrian routes.

The new public realm would benefit from high quality finishes and hard and soft landscaping. The new frontages and uses proposed to ground floor will provide increased activity and visual interest with an overall positive effect on the townscape character of the development site and on the setting of the locally listed Berol House.

The comprehensive townscape visual assessment supporting the application provides a clear understanding of the changing character of The Hale as experienced in the background of views across and out of Alexandra Palace Park, South Tottenham CA and Markfield park. The visual impact views include the cumulative schemes located within Tottenham Hale East as will be seen, among others, in views taken from various viewpoints along the Bruce Grove and Tottenham Green conservation areas along the Tottenham historic corridor. It is evident that there is already an ongoing high degree of change in scale and built form in the background of those views taken across the Tottenham Conservation areas and looking towards the Tottenham Hale station, and the transformation of this area is due to continue.

However, the proposed development would only be visible in the far background of the views across and out of the conservation areas and related heritage assets as part of a group of tall new elements of various heights and taller built forms such as the Millstream Tower, will be more prominent than the proposed development in some of these views, and particularly in the winter.

In views along Bruce Grove, where taller buildings are already characteristic of the wider townscape, the proposed development would be seen without harm in the context of historic townscape elements in the foreground.

In the long range views the new development would have a slender profile, stepping form and varied materials it would create a coherent cluster of tall buildings and a clear focal point in the townscape thus reinforcing the location of Tottenham Hale station.

	<p>The 2 Berol Yard building would signpost, in conjunction with an emerging townscape of taller buildings around Tottenham Hale, the new urban character and spatial hierarchy of the area, where the proposed development would become part of a new, varied skyline that will define Tottenham Hale town centre through a 'wave' skyline profile as envisaged in the council vision for the area.</p> <p>The proposed development would very positively retain the locally listed Berol House, would conserve, and unveil its heritage significance and would improve the urban quality of its setting, without any negative impact on the legibility, primacy, and significance of other heritage assets in the borough, and while delivering much needed improvements to the urban character of its locality. The proposed development is supported from the conservation perspective.</p>	
LBH Design Officer	<p><b><u>Summary</u></b>  These proposals form one of the last jig-saw pieces in the ambitious high-density redevelopment of the north side of the Tottenham Hale transport interchange, transforming it from a beleaguered, windswept, traffic dominated isolated place of no character, to a dynamic, vibrant new town centre. In particular, in what they propose to do to Berol House, there should be a beautiful, elegant historic building at the heart of this new town centre, with a properly enlivened active frontage to all sides and the mix of workspaces and retail offers to provide for life, whilst the Berol Yard tower should aid in wayfinding, act as a marker to the Green Link, help provide the crucial bridge over the road and railway for that Green Link, tying it into the burgeoning community and wider assets. In addition, this site promises to provide a significantly increased number of much needed now homes, to high quality designs and amenity standards, with innovative amenity spaces and community facilities, yet with the superb access to existing nearby parkland and facilities that all developments in Tottenham Hale benefit from. And the proposed tower will be an elegant, interestingly composed, sculptural landmark, that responds creatively yet contextually to its surroundings and the emerging cluster of brick-based, high-rise, vibrant and distinctive buildings.</p> <p><b><u>Principal of Development, Planning Policy Context and Masterplanning</u></b></p>	Comments noted.

1. This proposal represents one of the last developments envisaged in the Tottenham Hale District Centre Framework (DCF; adopted by the Council, November 2015, further adopted as planning policy in the Tottenham Area Action Plan DPD, July 2017), that envisaged the transformation of the heart of Tottenham Hale into a high-rise, high-density new district centre clustered tightly around the transport interchange. Tottenham Hale is earmarked by the GLA to deliver 1,965 homes and is a Tall Building Growth Area and a Local Employment Area: Regeneration Area.
2. Specifically, this application is to replace previous permissions as part of a large masterplanned development known as Ashley Road South, by this developer in conjunction with the housing association Notting Hill Genesis. Ashley Road is the main existing north-south local street, and their original masterplan covered a large area of mostly industrial land either side of Ashley Road, between Down Lane Park to the north & west, Watermead Way to the east and a number of neighbouring landholdings to the south, most of which subsequently became the Argent Related development of five high-density, high-rise, mixed use blocks.
3. Crucially however, the council envisages a new east-west “Green Link” here; as enshrined in the AAP & DCF, this is intended to provide a direct and attractive pedestrian route linking Tottenham High Road, through the new Tottenham Hale town centre, to the Lee Valley Park to the east. It will require new bridges and crossings across roads, railways and watercourses, as well as new routes, acting as linear parks, through developments, but many stretches have already been secured including routes through the Hale Village and Hale Wharf development and bridges across Pymme’s Brook, the Lee Navigation and a flood relief channel, all close to the east of this site, and conversion of Chesnut Road into a linear park to the west. This site will sit at a crucial point, where a pedestrian bridge over the dual carriageway of Watermead Way and the railway should take off.
4. The joint developers’ masterplan, by architects John McAslan & Partners, was to retain one existing building, Berol House, a locally listed, four storey, brick, former pencil factory on the east side of Ashley Road. Between Berol House and Watermead Way, there was to have been a new further education college, which was designed in detail to an award-winning design, before unfortunately the original end user pulled out. The rest of the development was to be a series of medium to high

rise residential blocks, generally with employment and town centre uses on parts of their ground and first floors. Two separate applications were made and granted, one for each landholding; for Berkeley Square, HGFY/2017/2044. Their residential blocks, The Gessner, immediately north of the college site and east of Berol House, as well as two blocks west of Ashley Road, have now been completed.

5. This proposal is therefore to replace the proposed college, and complete Berkeley Square's part of the Ashley Road South masterplan, but in a significantly modified form. The proposals make minor detailed modifications to the use and appearance of Berol House, which seek to strengthen its intended role as the heart of the new town centre and replace the intended college with a new tall building; both of these are discussed in detail in the relevant sections below.
6. It is within the site allocation Ashley Road South for the creation of an employment-led mixed-use quarter, creation of a new east-west route linking Down Lane Park and Hale Village, enhanced public realm and residential use. Berol House is a Locally Listed Buildings, but there are no designated or undesignated heritage assets in the immediate vicinity. The Conservation Officer has provided detailed heritage advice on this application.

**Street Layout**

7. The proposals do not radically change the street layout from that previously approved and to a considerable extent already emergent, but do make improvements, increasing the likely legibility and vibrancy of the streets and footways around and across the site and improving the site's contribution to wider street patterns and legibility. In particular active frontages are considerably increased in both the existing Berol House and new Berol Yard. There will be much greater definition of the space between the two, which will be pedestrian only and have active retail frontages to both sides, and about which the applicant's architects have thought carefully about the proportions, so that it will match those of successful streets, and which therefore promises to be a vibrant street, Berol Walk, containing street trees and outdoor seating, spilling out from the retail units.
8. Berol Walk will meet the east-west Green Link at a new small square, where the main residential entrance will be located, as well as the foot of the public stairs and a balcony looking down onto the square from the proposed first floor community

facility. The square will provide a “moment” on the Green Link, a pint of puncture, as well as an opportunity to reorientate. The green link will proceed east and west as another tree lined pedestrian street, wider in its short western link to where it will form a key crossroads with Ashley Road, allowing the attractive, distinctive and historic gable end wall to Berol House to be appreciated, and eastwards to Watermead Way as a narrower pedestrian street more related to the neighbouring Argent development.

9. Streets form the main public realm creation of this proposal, and they are not lavishly landscaped with much greenery, but this is an urban location, and it is appropriate that the streets proposed will be of very high quality but predominantly hard paved materials. The proposals still include a significant provision of new street trees, along both the Green Link and Berol Walk, as well as street furniture and opportunities in the new square for art and seasonal installations (such as a Christmas Tree). It is also very impressive that they have come up with such a robust and simple external public landscape proposal, without extraneous clutter. There will also be a lot of green landscaping in the many green roof terraces, both accessible to residents/workers and for biodiversity only, on both buildings, with all of the play provision required for under 5s and 5-11s in the residential building provided on the podium gardens.
10. But the most important contribution this proposal makes to street layout is the contribution it makes to furthering development of the East-West Green Link, through an improved east-west street along the southern edge of their site and through provision of stairs, lifts and a financial contribution for the bridge over Watermead Way and the railway. The bridge is a crucial part of the long planned green link, connecting this and other major developments in Ashley Road and west to the waterside spaces and parkland of the Lee Valley, including Tottenham Marshes, The Baddock and Walthamstow Wetlands, free of traffic, and connecting those spaces and developments east of the railway into this new town centre, to the established (& soon to be improved) Down Lane Park and beyond to the established vibrant historic high street of Tottenham High Road. The height of this development will provide a visual marker for the green link and its bridge, which is part of the justification for its height, as well as seamlessly incorporating the necessary stairs and lift, to

generously proportion and clear, simple, legible, secure and decidedly grand form, so that in future the bridge need only land at this landing. To provide an immediate function for the stairs and lift, although intended to carry on after the bridge completion, a new community room is proposed off the landing; available to hire for societies, celebrations and functions. The s105 and CIL moneys raised in this development will also contribute to the delivery of the bridge itself, including sufficient funding to allow an immediate commitment to an early feasibility study.

**Height, including Tall Buildings**

11. The heights proposed follow the strategy of the District Centre Framework, previous approval and approvals on neighbouring sites, but substantially increase the new Berol Yard residential building to 32 floors, compared to 8 , admittedly taller floors for the previously planned college, whilst the height of Berol House remains at 6 storeys. Housing targets and expectations of density have increased since those previous approvals, and active travel and public transport improvements have been or are being delivered, particularly the new station entrance, extra track and platform, and segregated cycle lanes on Ashley Road and Watermead Way. But the main justification for the significant height increase is in landmark creation for wayfinding, reanalysis of the tall building cluster, and the quality of architectural and landscape design. The tall building will be embedded within a podium and shoulder blocks, tying them into the wider grain and street pattern, and mitigating their scale, wind, daylight and sunlight effects.
12. Considering each criterion from Haringey’s tall building policy is set in SP11 of our Strategic Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017), skipping the 3rd & 4th bullets from the Strategic Policies, that reference the other document and the document used in preparing DM6:
  - The site is within the areas of both the adopted Tottenham AAP and the adopted District Centre Framework. Both support the principle of tall buildings in this location. The adopted District Centre Framework established in 2014 a principle that it would be acceptable to have a “wave” of height, with a cluster of the tallest buildings in Tottenham Hale around the station, dropping immediately away before rising somewhat and then dropping gradually down

	<p>to the existing retained hinterland. So the tallest building in the Argent Related development, at 38 storeys, is on the west side of the station square, whilst they then drop to 10-16 storeys, before rising to 20 storeys on the Welbourne site (&amp; recently approved separate student housing). Similarly Hale Works at 34, dropping to 8-10 in Hale Village, then in the 20s at Hale Wharf to the east. It was not initially identified that there would be quite the same wave to the north, but Argent's northern sites, The Gessner and the unbuilt but approved Notting Hill Genesis plot to its north are all medium-tall at over 15-20 storeys. This 32-storey tower at Berol Yard will relate to Argent's tallest and Hale Works as a triangle of well-spaced tall buildings, straddling and pinpointing the station, with its shoulder elements relating to the medium-tall neighbours and lower shoulder to Berol House, the mansion blocks to the west and lower elements of Argent and The Gessner. As such it can be seen as a reasonable adaption to the flexible but still coherent three-dimensional design of the Tottenham Hale tall buildings cluster;</p> <ul style="list-style-type: none"> <li>• The council prepared a borough-wide Urban Characterisation Study in 2016, which supported tall buildings in this location, beside the railway edge, well away from the historic heart of Tottenham or an pre-existing residential neighbourhoods, close to but not right on the edge of the large extensive open spaces of the Lee Valley, and marking the major transport interchange and emerging new town centre;</li> <li>• High quality design especially of public realm is promised in the proposals, as described in other sections above and below;</li> <li>• It will be capable of being considered a "Landmark" by being a wayfinder or marker for the East-West Green Link, location of the bridge, and the heart of the new town centre. The bridge in particular is identified in the QRP comments as providing particular justification for locating a tall building precisely here;</li> <li>• It should also be capable of being considered a "Landmark" by being elegant, well-proportioned, and visually interesting when viewed from any direction, by virtue of its particular, "clustered" design of distinct angled fragments. This is described more fully below, but the different fragments are designed to relate</li> </ul>	
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to their different context; lower ones to immediate neighbours, with matching brick colours and angles of façade, whilst taller fragments relate more to their longer views to the marshes and to central London;

- Consideration of impact on ecology and microclimate encompasses daylight, sunlight, and wind, examined in detail below, but this includes how the fragments and podium break up down draft and the angles of the taller fragments allow continued day and sunlight access to immediate neighbours including The Gessner. Impact on ecology could also include impact on the flight of birds and other flying creatures, but this proposal is not immediately adjacent to open countryside, a large open space or open waterway;
- And the urban design analysis and 3d model views of their proposal satisfactorily shows that the tower could be a successful and elegant landmark, contributing to the planned cluster of tall buildings.

#### **Local, Wider & Strategic Views**

13. The development forms part of an emerging cluster of tall buildings, including taller buildings than this developer has already permitted, under construction and already completed, around Tottenham Hale. London and Borough Strategic View Corridors all happen to be distant from this development, and therefore are not considered to be affected by this development.
14. Given the number of other tall buildings already approved (including some now built) in the cluster immediately around this site, there would probably be no locations where this proposal would be visible but there are currently or approved no other tall buildings visible. Nevertheless, following consultation between the applicants and officers, a number of close and distant views of the proposals have been produced, in each case including a version at the time of assessment and with the “cumulative impact” from other approved but unbuilt or unfinished buildings collaged in. Furthermore, discussions between officers and the applicants have resulted in a number of improvements and corrections to those views, so that officers can now confidently confirm that they accurately show the townscape and visual impact of this proposal.
15. The applicants most recent and accurate views demonstrate that this proposal will sit within the cluster of built, under construction and planned all buildings marking the

centre of Tottenham Hale. It will not stand out but will sit assertively as one of the tallest buildings around the station square, also marking the green link and bridge. As such it will contribute appropriately to the legibility and distinctiveness of this important emerging centre and help make the cluster attractive and appealing in longer, medium and local views.

16. As the two proposed buildings are distinctly separate in the site layout and designed by different architects, I will deal with each separately, starting with Berol House, the retained and to be extended existing building, which is relatively straightforward, followed by 2 Berol Yard, which will be split into sections for each particular subject.

#### **Detailed Design of Berol House**

17. The architects for this, McAslans, designed the originally approved scheme for Berol House, and have now modified those proposals to suit the changes in this new application. Previously, the existing Berol House structure was to be upgraded for continued employment use, with a two-floor rooftop extension to contain new housing. Under this proposal, the proposed rooftop extension is to also be in employment use, and has been increased moderately, with a part third additional floor to the centre of the plan, whilst the ground floor is to be in town centre uses such as retail.
18. The detailed design of the additional floors, which was already considered acceptable, has been improved, with a more elegant cladding and fenestration pattern, with a terracotta frame to the two whole additional floors, with glazing between, coordinated with the rhythm and proportions to the existing floors, and with the third additional floor, which is significantly drawn in from the northern and southern ends, predominantly glazed. This amended design for the additional floors will be at least as elegant as the high-quality design previously approved.
19. The change to proposed uses on the ground floor is accompanied by significant design changes, creating more openings, and making pretty much all of the ground floor active frontage. The public cut-through about 2/3 of the way up the block is retained but relocated to the centre of the block, more appropriately using the arched openings under the central pediment, and this is where the main entrance to the stairs and lifts to the upper floors, which are now to be internal rather than in external glass boxes, are relocated. Ground floor units will have the ability to open to both

sides. This should enable Berol House to make an improved contribution to a busy, lively, vibrant heart of the new Tottenham Hale Town Centre and celebrate its historic role.

**Detailed Design of Berol Yard (the new-build residential tower)**

**Architectural Expression, Fenestration & Materiality**

20. This is proposed to be a sophisticated composition of a series of rectilinear “fragments”, rising up gradually to greater heights as their angles shift off the street grid, out of a square podium that fills the plot, giving the surrounding streets a human scaled sense of enclosure. The lowest block, in the south-eastern corner, aligns with the east-west Green Link and houses its stair, lift and community facility, whilst its height aligns with Berol House and the lower shoulders of the neighbouring Argent and other blocks. The second fragment is angled to face and address the proposed square, off which it is set back behind a 2<sup>nd</sup> floor podium, and main approach from the Ashley Road–Green Link crossroads and aligns in height with the medium-tall blocks. The third fragment faces west across the rooftops towards Tottenham High Road, again set-back behind a wider podium from Berol Lane. The fourth is angled away from the north side to face north-east across Tottenham Marshes and open up the side of The Gessner. The fifth faces south-east across the lower Lee Valley and Walthamstow Wetlands, with only the core rising slightly higher. This should be a truly interesting and appealing three-dimensional composition.
21. Materiality responds to the different fragments and their differing relationships. Brick colours relate to the buildings they face, whilst the tones get lighter as their height increases, so that the lowest block will be a unique dark green brick relating to the Green Link, the second fragment a darker red relating to the Argent building opposite it, the third a red-buff relating to Berol House, the fourth a lighter grey-brown relating to The Gessner and the fifth a light pink buff, with the core where it rises above being a darker material uniting the composition.
22. The fenestration pattern is of orderly, gridded facades of identical rectangular window openings, with the modelling providing interest, but fenestration varies where the columns of larger balcony openings occur and most of all at the top floor with the larger still openings for the communal facilities. The window design may be repetitive though, but it is an exceptionally carefully designed window, based on the classic

“Chicago” window of a larger central pane with two narrower side panes, enlivened by louvres and sun shading relating to function and aspect to avoid overheating and allow flexible opening options to provide good daylight and ventilation levels without being difficult to use.

23. The overall architectural approach, especially the gridded facades and use of brick, will also match the other new high and lower rise buildings making up this vibrant new town centre at Tottenham Hale.

**Residential Quality (flat, room & private amenity space shape, size, quality and aspect)**

24. The proposals are for a mixture of different flat sizes from studios to three-bedroom, both affordable (33%) and market value, with 10% wheelchair adaptable. All flat and room sizes comply with or exceed minima defined in the Nationally Described Space Standards, as is to be routinely expected. Flats are designed to be attractive and usable to modern taste, with plentiful storage and open plan living-dining-kitchen generally with the kitchen area recessed.

25. All dwellings meet or exceed the private external amenity space in the London Plan, with generous, recessed private balconies. Privacy of lower floor balconies is achieved by being recessed and having at least partially solid balustrades. All flats (regardless of tenure) benefit as well from access to the large podium garden on the east side at second floor, the large, south facing, “Mediterranean Garden” roof terrace on the 18<sup>th</sup> floor and communal amenity room and two communal balconies off that on the 30<sup>th</sup> floor, exploiting the design which permits roof terraces in the steps in the blocks.

26. 67% of the proposed flats are dual aspect, by virtue of the design of “fragments” creating up to seven corner flats per floor, and the angling of the fragments ensures that there are no north facing single aspect flats. This is a very high proportion of dual aspect for a larger tall building.

**Daylight, Sunlight and Wind Microclimate**

27. The applicants provided Daylight and Sunlight Reports on levels within their development and the effect of their proposals on relevant neighbouring buildings, prepared in accordance with council policy following the methods explained in the Building Research Establishment’s publication “Site Layout Planning for Daylight and

Sunlight – A Guide to Good Practice” (2nd Edition, Littlefair, 2022), known as “The BRE Guide”.

28. These assessments show a good level of daylight and sunlight to the proposed dwellings, with 94% of habitable rooms in the proposed development meeting or exceeding the daylight levels recommended in the BRE Guide (where the living room level is taken for combined living-dining-kitchens) for average daylight factor (ADF) and 90% for daylight distribution (DD). Sunlight levels are a less impressive 54%, but this reflects the new guidance, which only came in during the design process, changing the criteria, and the significant number of flats in this proposal facing east, north-east or west, having less access to sunlight.
29. Regarding the proposals’ effect on existing neighbouring buildings, those under construction and those with planning permission but not yet started, there are some impacts. Many of these impacts can be understood as being due to this site being currently undeveloped, so the neighbours achieve a much higher level of daylight than would reasonably be expected, although assessment comparing this proposal to the day and sunlight effect of the previously approved college shows there is still a noticeable loss in many cases, albeit much reduced. It should also be noted that many of the neighbours assessed are not yet inhabited, being under construction or merely planned, so residents will never experience the better day and sunlight levels without this development, or not for very long.
30. In the case of higher density developments, and this is one of the places in London of the highest density, it should be noted that the BRE Guide itself states that it is written with low density, suburban patterns of development in mind and should not be slavishly applied to more urban locations; as in London, the Mayor of London’s Housing SPG acknowledges. In particular, the 27% VSC recommended guideline is based on a low-density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable. Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. Therefore, full or near full compliance with the BRE Guide is not to be expected.

	<p>31. To assess the impact of the proposals on wind microclimate, the applicants carried out wind tunnel testing of a physical model and measured the findings against long term wind statistics applicable to the site, in accordance with the industry standard “Lawson” criteria. Their assessment has been checked by the council’s own consultants and this response should be referred to.</p>	
<p>LBH Local Lead Flood Authority/Drainage</p>	<p><u>Comments 02/05/2023:</u> Based on the details provided within the email dated 21 April 2023 I can confirm that the comments raised by us (LLFA) have been adequately addressed.</p> <p><u>Comments 28/03/2023</u> I’ve had a look through the GLA response and in relation to surface water management, the issues flagged in regards to the use of SuDS are broadly aligned with the comments below. In particular, the GLA have requested clarity on the proposed discharge rates to TW public sewers, due to some inconsistencies highlighted between the text and calculations appended to the report. They have also requested evidence from TW to confirm sufficient capacity is available within the public sewer network to accommodate the proposed flow rates.</p> <p>I have essentially flagged these issues up within the response below and have highlighted that the response from TW contained within the appendices of their report indicates that there is insufficient capacity available to accept the proposed discharge rate provided by the developer/consultant as 6.3l/s (rather than 5.7l/s)</p> <p>The inclusion of rainwater harvesting has been discounted based on very little evidence, which has been flagged within the GLA response. Typically for a high occupancy to roof area ratio the rainwater roof catchment would not support its inclusion, particularly given that there is a green/blue roof.</p> <p>Lastly the GLA response highlights the need for a Flood Warning and Evacuation Plan. I am not sure whether our Emergency Planning team would request the inclusion of a</p>	<p>Noted that comments have been adequately addressed. Conditions added.</p>

specific condition in relation to the requirement to submit a FWEP, as based on a review of previous LLFA consultation responses provided to the planning team I have not seen one added, although this may well be just that the site is located within FZ1.

In summary, there is broad alignment in the issues flagged within the LLFA consultation response and the GLA response you have forwarded across

Comments 13/03/2023

Thank you for consulting us on the above captioned planning application ref HGY/2023/0261 for full planning permission relating to the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works at Berol Quarter, Ashley Road, London N17 9LJ.

It is noted that this application is linked to HGY/2023/0241, which seeks to amend the original hybrid planning application consent issued under HGY/2017/2044 given that the Applicant no longer intends to deliver the final phases of permission ref. HGY/2017/2044 at the wider Berol Yard site and instead proposes to deliver the proposals submitted under HGY/2023/0261.

It is acknowledged that in relation to drainage and flood risk, various details have been previously provided as part of the original planning application and subsequent reserved matters applications to discharge drainage related conditions attached to HGY/2017/2044, notably HGY/2018/2165 and HGY/2019/2068. Therefore, we note that many of the principals and approaches for the management of surface water run-off from the development have been established and agreed as part of the previous consultations on planning applications submitted in relation to this site.

In terms of flood risk and drainage, Planning Application HGY/2023/0261 is supported by the report prepared by WSP, entitled 'BEROL QUARTER Flood Risk Assessment & Outline Drainage strategy' (Doc ref no. 70094918-WSP-XX-XX-RP-CV-00001), dated Dec

2022 and related drawings and documents. Further to review of the submitted details, we have made the following observations regarding the proposals, which are outlined below;

- 1) It is noted that in terms of discharge destination, the Applicant/Agent intends to discharge flows off site to the existing public surface water sewer located within Ashley Road. Whilst the LLFA and it appears TW have been previously consulted on the proposals and accepted proposed discharge rates we it is noted that Appendix C.1 of the above captioned report includes a pre planning enquiry from Thames Water, dated 21<sup>st</sup> November 2022 (TW Ref. DS6100012) to seek confirmation that sufficient capacity within the public sewer network. Section 11.4.1 of the FRA and Outline Drainage Strategy report states that 'Thames Water has responded to the Pre-Development enquiry for the Proposed Development confirming sufficient capacity at the proposed points of connection, as shown in Appendix C.1.' However, it is stated within the TW response that there is insufficient capacity within the existing system to accept the proposed discharge of 6.3l/s for all storm events up to and including 1 in 100 yr plus climate change event (+40% uplift) into the 225mm surface water sewer in Ashley Road located downstream of manhole TQ34894603. Clarification and confirmation from TW on this is considered essential given the viability of the drainage strategy is intrinsically linked to the availability of sufficient capacity to accept proposed surface water discharges from the development. If it is confirmed insufficient capacity is available, then either a) alternative proposals should be provided which restrict discharges to the accepted discharged rate that TW agree can be accepted by their public surface water system, or, b) provide confirmed scope of upgrading works required within the off-site public sewer system to accept the flows. It is anticipated that these would be implemented under a S98 Sewer Requisition under the WIA 1991
- 2) It is noted that the scheme as shown in the Drainage Layout (Drg. 70094918-WSP-XX-XX-M2-D-0501-P01) that the surface water drainage system will be reliant on a pumped outfall, due to level constraints in achieving a gravity discharge to the public system. As noted under Section 8.1.10 of the WSP report, pumping of surface water is considered to be unsustainable, however, it is accepted as being an established

principle of the proposed surface water strategy which has previously been considered and agreed as part of the previous planning applications relating to this site. Whilst the use of pumped outfall is established part of the proposed drainage strategy, we note that there has been no assessment of the residual flood risks associated with any potential failure of the package pumping station, nor has any details been provided on what provisions have been made in terms of emergency storage provision in the event of breakdown. Whilst it is acknowledged that less vulnerable uses are proposed at ground floor with more vulnerable residential uses located at first floor and above, some form of assessment of the risk of failure should be provided. Further clarification in regards to the pumping station and assessment of residual flood risks are requested.

- 3) Currently the full planning application is support by outline details and calculations in the form of WinDES Source Control and 'Quick Storage' outputs, which are not considered to be acceptable for a full planning application. Full calculations are required that include all relevant SuDs features and the associated storm network that consider a full range of rainfall data for each return period provided by Micro drainage modelling or similar simulating storms through the drainage system, with results of critical storms, demonstrating that there is no surcharging of the system for the 1 in 1 year storm, no flooding of the site for 1 in 30 year storm and that any above ground flooding for 1 in 100 year storm is limited to areas designated and safe to flood, away from sensitive infrastructure or buildings. These storms should also include an allowance for climate change.
- 4) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method. At present the outputs provided within the submitted report do not clearly state which rainfall dataset has been adopted for the purposes of design.
- 5) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of where it is anticipated that flooding will occur within the proposed network (if any) and an

indication of overland routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.

Following clarification of a number of the above items may result in the requirement to make some material amendment to the submitted drainage strategy, flood risk assessment, outline drainage strategy report and drainage layout drawings (size/siting of attenuation tanks, wet well, point(s) of discharge, etc. etc.)

Subject to the above clarifications, we would consider the proposal to be broadly acceptable to us, subject to the following planning conditions to be implemented regarding the Surface water Drainage Strategy and its management and maintenance plan.

**Surface Water Drainage condition**

No development shall take place until a detailed Surface Water Drainage scheme for site has been submitted and approved in writing by the Local Planning Authority. The detailed drainage scheme shall demonstrate:

- a) A hydraulic calculations using XP Solutions Micro-Drainage software or similar approved. All elements of the drainage system should be included in the model, with an explanation provided for any assumptions made in the modelling. The model results should be provided for critical storm durations of each element of the system and should demonstrate that all the criteria above are met and that there is no surcharging of the system for the 1 in 2 yr rainfall, no flooding of the surface of the site for the 3.3% (1in30) rainfall, and flooding only in safe areas for the 1% (1in100) plus climate change.
- b) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets rather than usage of FSR rainfall method.

	<p>c) Any overland flows as generated by the scheme will need to be directed to follow the path that overland flows currently follow. A diagrammatic indication of these routes on plan demonstrating that these flow paths would not pose a risk to properties and vulnerable development.</p> <p>d) The development shall not be occupied until the Sustainable Drainage Scheme for the site has been completed in accordance with the approved details and thereafter retained.</p> <p><b>Reason : To endure that the principles of Sustainable Drainage are incorporated into this proposal and maintained thereafter.</b></p> <p><b><u>Management and Maintenance condition</u></b></p> <p>Prior to occupation of the development hereby approved, a detailed management maintenance plan for the lifetime of the development, which shall include arrangements for adoption by an appropriate public body or statutory undertaker, management by Residents management company or other arrangements to secure the operation of the drainage scheme throughout the lifetime of the development. The Management Maintenance Schedule shall be constructed in accordance with the approved details and thereafter retained.</p> <p><b>Reason: To prevent increased risk of flooding to improve water quality and amenity to ensure future maintenance of the surface water drainage system</b></p>	
<p>LBH Pollution</p>	<p>Re: Planning Application HGY/2023/0261 at Berol Quarter, Ashley Road, London N17 9LJ.</p> <p>Thanks for contacting the Carbon Management Team (Pollution) regarding the above full planning permission for the refurbishment and extension of Berol House to include Use Class E floor space; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floor space; with associated landscaping, public realm</p>	<p>Noted conditions on Land Contamination, Unexpected Contamination, NRRM and Demolition/Construction Environmental</p>

	<p>improvements, car and cycle parking, and other associated works and I would like to comment as follows.</p> <p>Having considered all the relevant supportive information on pollution especially the Air Quality Assessment report with reference 70094918 prepared by WSP dated November 2022 taken note of sections 3 (Scope and methodology), 4 (Baseline conditions), 5 (Assessment of impacts), 6 (Mitigation &amp; residual effects) and 7 (Conclusions) as well as the Design and Access Statement dated 12th December 2022, please be advise that we have no objection to the proposed development in respect to air quality and land contamination but the following planning conditions and informative are recommend should planning permission be granted.</p> <p>1. Land Contamination Before development commences other than for investigative work:</p> <p>a. A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information.</p> <p>b. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.</p> <p>c. If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. The site investigation must be comprehensive enough to enable; a risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement detailing the remediation requirements.</p> <p>d. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority which shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.</p>	<p>Management Plans. All aspects form part of the recommended conditions.</p>
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e. Where remediation of contamination on the site is required, completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

2. Unexpected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

3. NRMM

a. No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIB of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.

b. An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly

serviced, and service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

4. Demolition/Construction Environmental Management Plans

- a. Demolition works shall not commence within the development until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the local planning authority whilst
- b. Development shall not commence (other than demolition) until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority.

The following applies to both Parts a and b above:

- a) The DEMP/CEMP shall include a Construction Logistics Plan (CLP) and Air Quality and Dust Management Plan (AQDMP).
- b) The DEMP/CEMP shall provide details of how demolition/construction works are to be undertaken respectively and shall include:
  - i. A construction method statement which identifies the stages and details how works will be undertaken;
  - ii. Details of working hours, which unless otherwise agreed with the Local Planning Authority shall be limited to 08.00 to 18.00 Monday to Friday and 08.00 to 13.00 on Saturdays;
  - iii. Details of plant and machinery to be used during demolition/construction works;
  - iv. Details of an Unexploded Ordnance Survey;
  - v. Details of the waste management strategy;
  - vi. Details of community engagement arrangements;
  - vii. Details of any acoustic hoarding;

	<p>viii. A temporary drainage strategy and performance specification to control surface water runoff and Pollution Prevention Plan (in accordance with Environment Agency guidance);</p> <p>ix. Details of external lighting; and,</p> <p>x. Details of any other standard environmental management and control measures to be implemented.</p> <p>c) The CLP will be in accordance with Transport for London's Construction Logistics Plan Guidance (July 2017) and shall provide details on:</p> <ul style="list-style-type: none"> <li>i. Monitoring and joint working arrangements, where appropriate;</li> <li>ii. Site access and car parking arrangements;</li> <li>iii. Delivery booking systems;</li> <li>iv. Agreed routes to/from the Plot;</li> <li>v. Timing of deliveries to and removals from the Plot (to avoid peak times, as agreed with Highways Authority, 07.00 to 9.00 and 16.00 to 18.00, where possible); and</li> <li>vi. Travel plans for staff/personnel involved in demolition/construction works to detail the measures to encourage sustainable travel to the Plot during the demolition/construction phase; and</li> <li>vii. Joint arrangements with neighbouring developers for staff parking, Lorry Parking and consolidation of facilities such as concrete batching.</li> </ul> <p>d) The AQDMP will be in accordance with the Greater London Authority SPG Dust and Emissions Control (2014) and shall include:</p> <ul style="list-style-type: none"> <li>i. Mitigation measures to manage and minimise demolition/construction dust emissions during works;</li> <li>ii. Details confirming the Plot has been registered at <a href="http://nrmm.london">http://nrmm.london</a>;</li> <li>iii. Evidence of Non-Road Mobile Machinery (NRMM) and plant registration shall be available on site in the event of Local Authority Inspection;</li> <li>iv. An inventory of NRMM currently on site (machinery should be regularly serviced, and service logs kept on site, which includes proof of emission limits for equipment for inspection);</li> <li>v. A Dust Risk Assessment for the works; and</li> <li>vi. Lorry Parking, in joint arrangement where appropriate.</li> </ul>	
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The development shall be carried out in accordance with the approved details. Additionally, the site or Contractor Company must be registered with the Considerate Constructors Scheme. Proof of registration must be sent to the Local Planning Authority prior to any works being carried out.

Reason: To safeguard residential amenity, reduce congestion and mitigate obstruction to the flow of traffic, protect air quality and the amenity of the locality.”

5. Combustion and Energy Plant

Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 40 mg/kWh (0%).

Reason: As required by The London Plan Policy 7.14.

6. Combined Heat and Power (CHP) Facility

Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility of the energy centre or centralised energy facility or other centralised combustion process and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority.

The details shall include:

- a) location of the energy centre;
- b) specification of equipment;
- c) flue arrangement;
- d) operation/management strategy; and
- e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link)

	<p>f) details of CHP engine efficiency</p> <p>The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>Reason: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system.</p> <p>Informative:</p> <p>1. Prior to demolition or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</p>	
<p>LBH Transportation</p>	<p>1. CONDITIONS:</p> <ul style="list-style-type: none"> <li>a. Cycle parking provision to comply with London Plan and LCDS.</li> <li>b. Construction Logistics and Management Plan.</li> <li>c. Delivery and Servicing Management Plan.</li> <li>d. Car and Cycle Park Management Plan including reduction of retained contractual parking spaces on site.</li> <li>e. Reassessment of car parking provision for disabled users – given that current proposals are deemed non-compliant.</li> </ul> <p>2. S106 (HoT):</p> <ul style="list-style-type: none"> <li>a. Two separate Travel Plans and monitoring fees (£3000 each for Commercial and Residential Travel Plans).</li> <li>b. Provision of Car Club and £50 user credit for residents for a period of three years.</li> </ul>	<p>Following satisfactory responses to queries, no objection subject to recommended conditions and s106/s278 obligations.</p>

- c. Car free agreement to restrict eligibility of all residents from obtaining CPZ parking permits.
- d. Permissive paths agreement – Berol Passage / Berol Walk / Berol Square / Gessner Lane / staircase / lift etc.
- e. Provision and safeguarding of Bridge abutment / staircase and lift.

Tue 25/04/2023 18:43

Transport comments are as follows:

Hello Philip,

Further to our discussion, I summarise and confirm the following regarding the applicant's responses below:

- a. Cycle parking: Transport Planning would not support proposals for two-tiered cycle parking with provision of aisle width less than 2.5m. It is also inappropriate for cycle parking layout to be conditioned for later consideration.
- b. Blue Badge Car Parking: Transport Planning would not support failure to undertake the required 'careful consideration' and the corresponding low proposed level of Blue Badge Parking for Berol House. Please clarify time scale for reducing existing standard car parking.
- c. Please clarify time scales for interim and final layout for car parking / cycle parking layouts for Berol Yard.
- d. Regarding provision and utilisation of car club vehicles, the average figures provided for the year are not considered appropriate to assess provision for car club vehicles. Details of hourly utilisation throughout the weekday and weekends should be provided for existing conditions and assessment of details of future forecast demands / utilisation with committed and proposed development, are required. Details of Zipcar's criteria for triggering requirement for provision of additional car club vehicles should be provided. It is not acceptable for these matters to be left for consideration at some future date.

Regards,

Shreekant Patel

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Wed 19/04/2023 20:34

Transport comments regarding the applicant responses are as follows:

- a. The LCDS for aisle widths adjacent two-tiered cycle parking is required to ensure users do not have to lift bicycles from the cycle stands and improve quality of cycle parking provision. I do not agree that site constraints and competing uses make it necessary or acceptable for aisle widths to be reduced because this is a new development that should be designed to meet LCDS – it is not retro-fitting for an existing building. Standards should not be compromised to facilitate new development above capacity of site or for viability reasons etc.
- b. Regarding provision for 'Blue Badge' car parking for Berol House, I do not accept or agree with the applicant or GLA comment, that provision of one disabled person parking space is policy compliant because:
  - i. London Plan Policy 6.5 indicates at paragraph 10.6.23 - Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. **Careful assessment will therefore be needed to ensure that these percentages make adequate provision in light of the need for disabled persons parking bays by Blue Badge holders.** The provision of disabled persons parking bays should be regularly monitored and reviewed to ensure the level is adequate and enforcement is effective. **All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.**

	<p>ii. London Plan Policy T6.1 (Residential Parking) indicates at paragraph 10.6.12 - In implementing this policy, <b>if three per cent of a scheme is less than one space, this should be rounded up to one.</b></p> <p><b>The above references to ‘providing at least one space even if no parking is provided’, does not negate the need for ‘ careful assessment’ and is intended to be used as ‘rounding up’ figure for when considering smaller developments, rather than an absolute figure for larger developments - as currently proposed.</b></p> <p>iii. Given that Policy T6.1 (G) requires 10% of dwelling to be accessible with parking provision – it is necessary to consider both end of journeys - between home and work, and the corresponding parking provision at each trip end, when undertaking the required ‘careful assessment of adequate / appropriate provision’ of disabled persons parking, for employment/office use proposals.</p> <p><b>No evidence presented of ‘careful assessment’ having been undertaken that demonstrates that provision of one ‘Blue Badge’ holder parking space is adequate /appropriate or policy compliant for the proposed office development. The applicant should consider the percentage of working age people with ‘Blue Badge’ parking permits, together with employee capacity at proposed Berol House employment space etc. to assess potential demand and provision for disabled persons parking. Please also consider the general duty of Local Authority under the Equalities Act 2010, when assessing provision for disabled person parking.</b></p> <p>iv. There appears to be an error in statement ‘ However, the Applicant is keen to highlight that it expects the residential Blue Badge parking provision not to exceed demand,...’. It is not considered to appropriate to reallocate disabled persons parking spaces required for accessible units, for use by</p>	
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disabled office employees / visitors. The required provision for each proposed use should be provided.

- c. Regarding Figure 6.12 and Figure 6.6 – Are the car parking spaces and the cycle parking both at ground floor levels or different levels?
- d. Regarding provision of Club bays, the current proposals are significantly different from those previously considered under Planning Ref: HGY/2017/2044. The TAR should assess / review the existing and committed demands for car club vehicles and demonstrate adequacy of provision of car club vehicles / capacity, to service the cumulative demands including from additional residential development proposals. A detailed proposal will be required.

Regards,

Shreekant Patel

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Tuesday, March 21, 2023 4:26 PM

Transport comments are as follows:

- a. The site has excellent public transport accessibility (PTAL=6a) and is located within a CPZ.
- b. The proposals are for the refurbishment of Berol House to provide 5209m<sup>2</sup> GEA Office use and 714m<sup>2</sup> GEA retail/commercial use. In addition, the proposals includes development of 2 Berol Yard to provide 210 residential units, 706m<sup>2</sup> retail / commercial use and 161m<sup>2</sup> community use space.
- c. The proposal includes cycle parking provision for 48 long-stay and 30 short-stay cycle parking spaces for Berol House and 380 long-stay plus 24 short-stay spaces for 2 Berol Yard. The layout of cycle parking does not meet LCDS standards for aisle widths adjacent to two-tiered cycle parking. Revised submission of detailed

	<p>cycle parking layout with dimensioned plans that complies with LCDS, are required.</p> <p>d. The proposals for 2 Berol Yard will be car free except for provision for 'Blue Badge' car parking. This will initially include 3% provision for 6 'Blue Badge' holder parking spaces required for the residential units and one space for retail use. London Plan requirement for 10% of dwellings to be accessible and have parking spaces is not subject to reduction by reference to data from other sites. A parking management plan will be required to set out how this level of provision will be provided.</p> <p>The proposals for Berol House will include provision for one Blue Badge parking space. However, there will be 30 standard car parking spaces retained for existing tenants with contractual rights.</p> <p>The provision of one 'Blue Badge' parking space for the commercial use (5209m2 GEA) is not considered adequate. Further detailed assessment is required using number of employees / multiple occupiers and statistics of percentage of working age people with 'Blue Badge' permits.</p> <p>Clarification is required regarding the overlaps in layout of interim retained 30 car parking in Fig.6.12, the cycle parking illustrate at Figure 6.6 and the vehicular swept path for a refuse vehicle, below.</p>	
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Figure 6-12 Interim Car Parking Provision

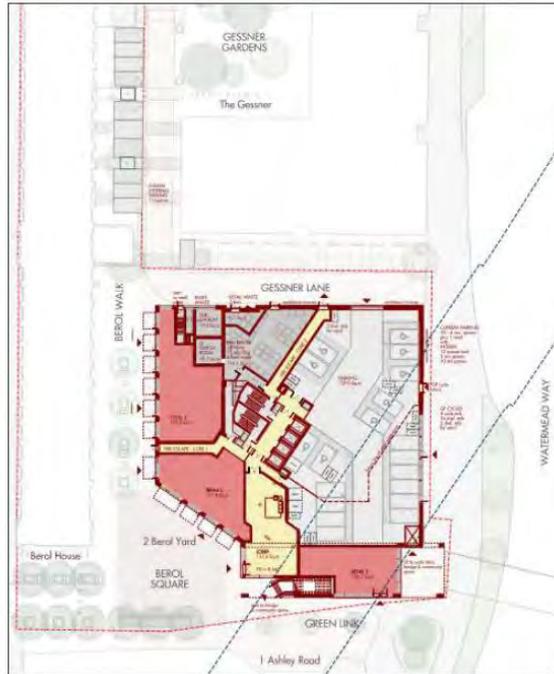
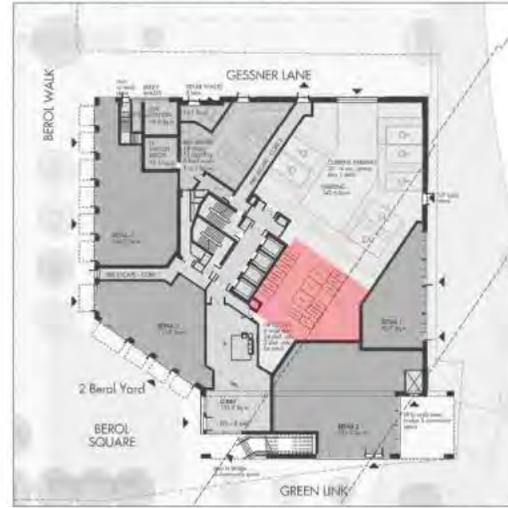


Figure 6-8 2 Berol Yard Ground Floor Cycle Facilities



- e. Further detailed assessment is required regarding the demand and provision for car club vehicles, 2 year free

membership for residents plus £100 user voucher etc. A s106 agreement for this will be required. The limited information included regarding existing car club bays in the vicinity is not considered adequate.

- f. East-west pedestrian movements through the Site will be via Berol Passage and Gessner Lane or Green Link. North-south pedestrian movements will be via Berol Walk. It is recommended these routes be designated and secured as public rights of way to enhance permeability.
- g. For 2 Berol Yard, servicing vehicles for retail units 1 and 2 will use the existing servicing bay on Watermead Way. Servicing vehicles for retail units 2, 3 and 4, and the residential lobby will use the servicing bay on Ashley Road. For Berol House, servicing vehicles for the retail units and office will be via the servicing bays on Ashley Road.
- h. Assessment of trip generation indicates there will be an overall net reduction in trips from the current proposals than from the previously consented development on this site.
- i. There is reference to a Bridge over Watermead Way and some provision for construction works (western abutment) being undertaken as part of this development. Please clarify what works are envisaged because these works may require a s106 / s278 agreement.
- j. Framework Travel Plans: A requirement for detailed travel plan to be submitted for approval prior to occupation should be secured via s106 agreement, This should allow for separate travel plans for the Commercial and residential uses. Each travel plan will also be subject to £3000 monitoring fee.
- k. Construction Logistics Management Plan. A condition is required for submission of a detailed construction logistics management plan for approval prior to start of any works on site. This should follow format of TFL Construction Logistics Plan

	<p>guidance. I understand there may have been a s106 charge for a highways / construction officer to coordinate traffic management works for the various adjacent development sites – this arrangement should be replicated / secured via s106 agreement for this development.</p> <p>I. A condition requiring submission of a car park management plan is required. This should include details of how car parking (for commercial and residential) will be allocated and managed. All car parking spaces should be leased and not sold with individual property.</p> <p>Under planning application HGY/2023/0241, the current Berol Quarter proposals would sever ties with previously consented development HGY/2017/2044 and be considered as a free-standing site. Please clarify:</p> <ul style="list-style-type: none"> <li>i. whether that means that all the infrastructure works secured with HGY/2017/2044 would need to be completed (representing a new base scenario), before the current application can be occupied because it would be reliant on loading bays on Ashley Road etc.</li> <li>ii. whether the proposed changes will affect any existing s278 agreements and s106 agreement obligations / funding for highway works and contribution for public realm improvements / design or DEN delivery etc.</li> <li>iii. There is reference to use of a booking system for delivery slots – however, given that deliveries will use loading bays on public highway, clarification is required regarding what is proposed.</li> </ul> <p>Regards</p> <p>Shreekant Patel Principal Transport Planner.</p>	
<p>LBH Waste Management</p>	<p>Fri 10/02/2023 I've had a look at the planning application documents for this development and in particular the operational waste plan and management strategy for Berol Quarter Ashley</p>	<p>Noted – Waste plan condition and obligation to secure funding for</p>

Rd, London N17. This is a detailed plan and provides clear information about how waste will be managed within individual units and externally. Reference was made to the recycling centre in Park View Rd (pg.4) but this site closed some years ago and the remaining Haringey recycling centre is in Western Rd, N22 6UG.

The proposal at Berol Yard has mixed residential, commercial, and retail units and the developer has confirmed that the commercial and retail units will be collected by a private contractor. It stated the commercial tenants would store and segregate waste and recycling in their unit, but I wasn't clear if that is then taken to the external storage points for collection or if the external storage is available in addition to collection from the unit, so clarification on that point would be helpful.

Containers for the residential units are calculated as outlined below and follow Haringey's guidance as do the pull distances of the containers to the vehicles. However, please note that Haringey can no longer provide 360 litre bins for food waste due to the weight and 140litre bins are used instead and would equate to 14 x 140 litre bins.

No. of units	Refuse	Recycling	Food waste
210	(1,100 L bin)	(1,100 L bin)	(360 L bin)
Ratio units/bin	6	10	35
1 collection/week	35 bins	21 bins	6 bins
2 collections per week	18 bins	11 bins	3 bins

Sizing of the bin store appears to have been based on a twice weekly collection of waste and recycling from the outset. While commercial waste collection companies can provide collections to suit the client, up to twice daily collections 7 days per week, we would however advise against sizing the bins store based on minimum size and maximum collections. The store should be sufficient to store waste for one week.

Applicant response Fri 28/04/2023:

twice weekly collection if necessary included.

	<p>We've reviewed the response from LBH Waste Management (attached) and have discussed with BSD and the architects. We note the officer is seeking clarification on a number of points. We've condensed these queries into the following bullet points where we also provide our response in red:</p> <ul style="list-style-type: none"> <li>• Will commercial tenants move their waste to the external waste store or is the intention for commercial waste to be collected from individual units- <b>Waste from the commercial units would be collected from the centralised retail bin store located on the ground floor. Commercial tenants would be responsible for moving waste from their unit to the centralised bin store ready for collection.</b></li> <li>• The waste store should be sufficient to store waste for one week- <b>As proposed, the waste store can only accommodate enough waste based on a twice weekly collection. The applicant intends to rely on private commercial waste collection services so in this context the capacity of the waste store is considered sufficient. To provide enough capacity to accommodate waste based on a once weekly collection, the size of the store would need to be increased resulting in the loss of car parking or commercial floorspace. On balance, when considering the clients operational intentions for the scheme, the current waste store provision should be considered acceptable.</b></li> <li>• Confirmation that proposed bin store can accommodate x 14 140L bins- <b>It is noted 360L can no longer be provided. We can confirm that the current proposed residential waste store has the capacity to accommodate x 14 140L bins instead of x6 360L bins.</b></li> </ul>	
<p>LBH Housing</p>	<p>We support the new proposals for rents on the DMR units to be set at 80% of market rent for studios and one-beds, 75% for two-beds, and 65% for three-beds as it aligns much better with our policy position on affordability. We would like to see a commitment to retaining rents calculated at these levels and using the same methodologies going forward.</p>	<p>Support from Housing colleagues is noted. The affordability of the DMR units shall be secured in the s106 legal agreement.</p>

	We also welcome the commitment to develop an approach to allocations jointly with the Council and would like to see that approach covering both LLR and DMR units. That process will need to ensure allocations and lettings align with our Intermediate Housing Policy. We would also like a commitment to prioritise households with children for the two- and three-bed DMR units, and to ringfence two- and three-bed LLR units for households with children.	
LBH Education	These comments are from a school place planning perspective: There is sufficient primary and secondary capacity in Planning area 4 where this development is located to fulfil the potential child yield this development may result in.	Noted
LBH Regeneration	<p>Planning Application Review: Alan Hayes Regeneration Manager, Tottenham Hale</p> <p><b>Berol Quarter (Berol Yard)</b>  HG/2023/0261 <span style="float: right;"><b>14.04.23</b></span></p> <hr/> <p><b>1. Background</b></p> <p>1.1 This paper offers comments and observations on the recent planning application in relation to Berol Quarter (Berol Yard). The site was granted planning permission under a hybrid application, HG/2017/2044, as part of the Ashley Road South masterplan.</p> <p>1.2 The proposal, as described within the planning application HG/2023/0261: <i>Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.</i></p> <p>1.3 Application detail:</p> <p style="margin-left: 40px;">1.3.1 Reference: HG/2023/0261</p> <p style="margin-left: 40px;">1.3.2 Applicant: Berol Quarter Ltd</p>	Noted, conditions securing detail of cycle parking, hard and soft landscaping and wayfinding included.

- 1.3.3 Agent: Lichfields
- 1.3.4 Architect: Allies and Morrison LLP

- 1.4 The application is due to go to planning committee in May of 2023.
- 1.5 The site is bordered to the east by Watermead Way, to the West by Ashley Road, to the north, by The Gessner development, and to the south, by the Ashley Road East development, both mixed-use schemes delivering a mix of residential and commercial uses.
- 1.6 The application has been referred to the GLA, in response to Categories 1A, 1B and 1C of the Schedule to the Order 2008. Comments from the GLA have been received by LBH via a Stage 1 report 27.03.23.
- 1.7 The purpose of this paper is to review and record comments against the application and its response to its surroundings in the context of the DCF, GOSS, SSS and regeneration projects delivered and forthcoming in Tottenham Hale.
- 1.8 It is imperative that new developments sit well in their context, responding well and have a good connection with the ground plane, public realm and landscaping.
- 1.9 As such, this review is concerned with activity and activation of the ground plane, public realm, landscaping, connection to context, and materiality in the context of Tottenham Hale, as illustrated and described in the application documents.
- 1.10 This review is *not* an assessment of the application in response to planning policy, a technical or statutory review, or a commentary on design quality of individual residential units.

1.11 On this basis, planning documentation reviewed here is largely limited to the Design & Access Statement, site plan, landscaping plans and ground floor plans.

1.12 Location and context:



**2. Application detail**

2.1 The proposal comprises:

- 2.1.1 Berol House - The addition of 3 new floors of commercial accommodation located above the existing 3 storey building. Lower floors will be refurbished and the ground floor of the existing building facade will be modified to offer flexible retail accommodation and a publicly accessible route through the building. Berol House will provide 5,500sqm GIA commercial floorspace.
- 2.1.2 2 Berol Yard – Podium blocks and tower elements of 18-32 storeys providing 210 rental homes with a mix of 706sqm flexible retail and commercial floorspace at ground floor level, with a community space of 161sqm and enabling works for a bridge connection over Watermead Way.
- 2.1.3 Berol Square – a public space framed by the adjacent buildings of Berol House and 2 Berol Yard. The extension of Berol Walk, a vehicle-free space into which the adjacent retail units will spill out, creating a vibrant, engaging space.

**3. Observations**

- 3.1 The following notes outline our comments and views on proposals with regards to layout, public realm, activity, access, movement, links and connection to context.
- 3.2 However, as noted above, this is not a full analysis of each document and report submitted, limited only to relevant drawings and the Design & Access Statement.

**4. Layout**

- 4.1 Berol Square location is positive and forms a point to pause on the Green Link, as opposed to being located adjacent to Berol Passage and The Gessner. *Ref 22049\_07\_002 Site Plan*
- 4.2 Residential entrance – a single, generous entrance and lobby area is commendable, regardless of tenure. *Ref 22049\_07\_100 GF Plan*
- 4.3 Frontage to Gessner Lane risks feeling more like a service area, with little or no activation and vehicle access, parking and waste storage facing the more active frontage of The Gessner. Access and turning, movement and activation of this area will require careful consideration. *Ref 22049\_07\_100 GF Plan*
- 4.4 Frontage to Berol Walk – looks to be well activated, taken up by retail units. *Ref 22049\_07\_100 GF Plan*
- 4.5 Frontage to Berol Square & Green Link – looks to be well activated with retail frontage, residential entrance and access to Green Link stairs. *Ref 22049\_07\_100 GF Plan*
- 4.6 Frontage to Watermead Way – activated in part with retail unit, although it is noted the preferred route for pedestrians may become via Berol Square/Walk. *Ref 22049\_07\_100 GF Plan*
- 4.7 Berol House/Passage – a welcome move to improve site permeability and accessibility to Berol Walk, subject to measures being in place to reduce ASB. *Ref 22049\_07\_100 GF Plan*
- 4.8 Community Space - located at First Floor and accessed via lift beneath colonnade and adjacent to Watermead Way. No entry point indicated on plan, assume this is access from the bridge lobby at FF/mezzanine level? Location at an upper level will mean this space needs to rely more heavily on advertising and signage to attract users. *Ref 22049\_07\_101 FF Plan*

**5. Public Realm & Landscaping**

- 5.1 Berol House – activation of ground floor/facades is welcomed, especially with dual aspect component omitting the feeling of ‘front and back’. *Ref DAS p.53*

- 5.2 Landscaping to Berol Square – represents a good opportunity to vary the surface materials, defining the quality and use of the space. *Ref DAS p.183*
- 5.3 Landscaping to Berol Walk – use of granite and hexagonal paving. Detailed layouts required to ensure proposals align with established TH palette. *Ref DAS p.186*
- 5.4 Landscaping to Berol Walk (North) – follows established palette of The Gessner development. *Ref DAS p.188*
- 5.5 Green Link (east) – landscaping materials noted as matching adjacent Ashley Road East site and/or being delivered by LBH to Watermead Way. Detailed layout required to fully understand, along with material junctions, hexagonal paving and street furniture. *Ref DAS p.191*
- 5.6 Materials Strategy – notes this is in two parts, matching either the established palettes of The Gessner, or 2 Ashley Road. Detailed specification required to fully understand along with response to wider TH palette. *Ref DAS p.192*
- 5.7 Landscaping materials to be conditioned throughout – these need to match and/or compliment adjacent plots and established/proposed materials across TH – Berol Sq could be varied, within acceptable parameters.

**6. Green Link**

- 6.1 There is a pinch point created just where the Green Link meets the public realm of Watermead Way and (future) bridge position. Detailed layouts to ensure materials, furniture and planting provide space and flow to movement through this area, in an accessible, welcoming environment, encouraging onward use of the Green Link. *Ref: DAS p.18, 19 / 22049\_07\_100 GF Plan*

**7. Accessibility and inclusivity**

- 7.1 Blue Badge parking – notes provision for 7 accessible spaces within development and 15 within public realm. DAS sets out potential 8 spaces within public realm (Berol Walk), leaving 7 of the 15 listed above to be located elsewhere. Where are these to be located? *Ref DAS p.152 & p.189*

7.2 Pedestrian and Cycle movement – looks to be clear and legible with generous public realm and a hierarchy of use within the landscaping. *Ref DAS p.169*

7.3 Cycle parking - strategy seems to be to access upper level bike store via a single lift – need to ensure lift is large enough to comfortably use with larger bikes, and those with trolleys/trailers taking shopping/children. *Ref 22049\_07\_100 Mezzanine Plan*

## **8. Wayfinding/signage**

8.1 No mention of wayfinding or signage – details to be submitted to understand this is appropriate and in line with emerging strategies.

## **9. Conclusion / Summary**

9.1 The application has been reviewed from a regeneration perspective, with regard to and as set out above, has focused on activity and activation of the ground plane, public realm, landscaping, connection to context, and materiality in the context of delivered and emerging schemes across Tottenham Hale.

9.2 Overall, the quality of the application and design proposals is acknowledged, making a positive contribution to the masterplan, the local area and the public realm.

9.3 However, there are a number of observations and points requiring further clarity (potentially through conditions to allow the applicant time to provide the additional detail suggested or requested, to satisfy LBH of compliance with established strategies and materials palettes, for example):

9.3.1 Detail of the design of the Green Link adjacent to Watermead Way, and access to the future bridge link (these must be generous and welcoming)

9.3.2 Landscaping materials and specification in relation to wider TH context.

9.3.3 Ensuring accessibility and inclusivity through adequate and user-friendly cycle storage and accessible vehicle parking.

	<p>9.3.4 Clarity required on wayfinding/signage strategies to be developed in conjunction with emerging TH strategies.</p>	
<p>LBH Economic Regeneration</p>	<p>We have now had chance to review the details regarding our discussions around workspace and would like to explore the following matters as the basis for agreeing a way forward in the very near future:</p> <p><b>1. 2 Berol Yard – [Made by Tottenham – Cultural and Arts Space]:</b></p> <ul style="list-style-type: none"> <li>• We would need a longer lease as most capital grant giving bodies require a lease for at least 25 years. We would also want to factor in some time to enable the development of a programme to take advantage of any grant funding.</li> <li>• We would be seeking Peppercorn Rent and relief on auxiliary and service costs for the full term of the lease to help establish a sustainable business model.</li> <li>• We would like to see reference to space being provided to an organisation that will “create a cultural and creative front door and hub for the local community” rather than any specific reference to Made By Tottenham at this stage as the position of MBT is still being considered by its members; this said we would like the terms to include reference to providing the Council with first refusal for the space.</li> <li>• A payment to contribute to the staffing and activation budget for first 5 years to help establish a sustainable business model around the curation of the internal and external spaces provided.</li> </ul> <p><b>2. Additional Affordable Workspace:</b></p> <ul style="list-style-type: none"> <li>• We would seek for this to be provided at a peppercorn rent (along with relief on auxiliary and service costs) for the duration of the term to help establish a sustainable business model.</li> <li>• We would also seek a payment and/or robust plan which contributes to the staffing and activation budget for this space to help engender the same</li> </ul>	<p>Noted.</p>

	<p>placemaking objectives that would have been met by Berol House encouraging visitors to explore the area, enticing them in, breaking down the barriers (in the case of Berol House the physical walls to create better permeability)</p> <p><b>3. 2 Berol Yard - Public Art and Community Contributions:</b></p> <ul style="list-style-type: none"> <li>We would seek for this period to align with the lease for the cultural and creative front door and hub as both must work (and be seen to work) together as one.</li> </ul>	
<p>LBH Streets and Spaces Consultant</p>	<p>Thank you for the opportunity to comment on this application. Our interest, from a highway perspective is focused on the ground floor of the building and the way it relates to our planter and the cycle lane in Watermead Way that we are in the process of constructing. We hope that with further engagement with the designers and landowner we can make adaptations to both of our designs to ensure the two schemes work together. The principles behind the proposal are a safest interaction between cyclists and pedestrians in the area and a rationalised material treatment of the surfaces.</p> <p>Currently the paving within the redline ownership boundary is different to the Modal proposed on the Highway. We would suggest that the same principle as has been adopted around the rest of the Tottenham Hale public realm is adopted here, namely that the narrow section of smaller (100x200mm) modal is used along the edge of the building to "frame" it and then the Highway proposed modal sizing 400x300 and 300x200mm is used on the remaining private land to tie in with the highway (land ownership to be demarked with studs). This will make the footway feel more generous, will create a consistent corridor for pedestrian on Watermead Way and address the feeling of pinch points between the building columns and our planter.</p> <p>From our side we will amend our design to bring the tactile paving and end of the segregated cycle lane to be in line with the edge of the proposed building to reduce pedestrian/ cyclist conflict at this junction and pinch point.</p>	<p>Noted, hard landscaping conditions will secure further details in this regard.</p>

	Other than the above we feel that the distances provided within the highway are adequate and that the proposals will contribute positively to this section of the Tottenham Hale scheme.	
<b>EXTERNAL</b>		
Environment Agency	<p>Thank you for your email and apologies for the delayed response.</p> <p>Upon looking at our records, it appears we have not responded to this application as it falls outside of our remit for comment. Although this site falls within Flood Zone 2, the advice falls under our national flood risk standing advice Review individual flood risk assessments: standing advice for local planning authorities - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p>	Noted.
Mayor for London / Greater London Authority (GLA)	<p><b>Strategic issues summary</b></p> <p><b>Land use principles:</b> The development of this brownfield site for a high-density, mixed-use development is acceptable in principle</p> <p><b>Affordable housing:</b> Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant.</p> <p><b>Urban design:</b> Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential over-development.</p> <p><b>Transport:</b> Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan. Other issues on sustainable development and environment also require resolution prior to the Mayor's decision-making stage.</p> <p><b>Recommendation</b></p> <p>That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 108. Possible remedies set out in this report could address these deficiencies.</p>	Noted conditions are recommended.

	<p><b>Context</b></p> <p>1. On 06 February 2023 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town &amp; Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.</p> <p>2. The application is referable under the following Category/categories of the Schedule to the Order 2008:</p> <ul style="list-style-type: none"><li>• Category 1A: “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”</li><li>• Category 1B: “Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres” and</li><li>• Category 1C: “Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London”</li></ul> <p>3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.</p> <p>4. The Mayor of London’s statement on this case will be made available on the GLA’s public register: <a href="https://planning.london.gov.uk/pr/s/">https://planning.london.gov.uk/pr/s/</a></p> <p><b>Site description</b></p> <p>5. The subject site comprises two plots, being 2 Berol Yard as well as Berol House. It forms an ‘L’ shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a</p>	
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vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm).

6. The site sits within the Ashley Road South Masterplan (ARSM), Tottenham Hale, London. The brownfield site is located within the Lee Valley Opportunity Area. It is partly located within the Tottenham Hale Town Centre. The surrounding area is characterised by mostly redeveloped site comprising new residential buildings, new retail and commercial units at ground floor level along with new landscaped routes.

7. The site is highly accessible with a PTAL of 5-6a (where 1 is least accessible and 6b is most accessible). The nearest section of the Transport for London Road Network (TLRN) is the A503 The Hale, approximately 100 metres to the south-west of the site. Tottenham Hale Underground Station is 180m from the site. It is also within close proximity of Tottenham Hale Bus Station which is served by eight regular bus services.

#### **Details of this proposal**

8. The proposal seeks planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide 210 new Built to Rent (BtR) residential homes as well as Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works. The commercial portion of the development would deliver 6,359sqm.

#### **Case history**

9. The applicant received planning permission at Berol Yard (ref: HGY/2017/2044) on 8 June 2018 for:

*“Application for full planning permission for the demolition of the existing buildings within the Berol Yard site and retention of Berol House. Erection of two buildings between 8 and 14 storeys providing 166 homes, 694 sqm (GEA) of commercial floorspace (Class*

*A1/A3/B1), 7,275 sqm (GEA) of education floorspace (Class D1), car and cycle parking, open space, landscaping and other associated works. Application for outline planning permission (all matters reserved) for the alteration and conversion of ground, first and second floors of Berol House with up to 3,685 sqm (GEA) of commercial floorspace (A1/A3/B1) and the introduction of a two-storey roof level extension introducing up to 18 homes, cycle parking and other associated works.”*

10. The permission has been partially built out with Building 4 and the associated public realm, now known as the Gessner, having been completed and occupied in 2021. The remaining two plots (Berol House and the College building) of the original hybrid planning application have been unable to be progressed

11. There is a Section 73 linked to this application for a minor material amendment to the permitted scheme at Berol Yard (planning permission ref: HGY/2017/2044). This application seeks to delete and amend existing conditions and add a condition to ensure that phases 3, 4, and 5 will be severed from HGY/2017/2044 upon implementation of any new planning permission being granted in respect of these phases.

**Strategic planning issues and relevant policies and guidance**

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Local Plan: Strategic Policies DPD (2013 with alterations 2017); Haringey Local Plan: Development Management DPD (2017); Haringey Local Plan: Site Allocations DPD (2017); Tottenham Area Action Plan (2016); Tottenham Hale District Centre Framework (2015); and the London Plan 2021.

13. The following are also relevant material considerations:

- The National Planning Policy Framework (2021) and National Planning Practice Guidance;
- National Design Guide (2021).

14. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Good Growth - London Plan
- Economic development - London Plan; the Mayor’s Economic Development Strategy; Employment Action Plan;
- Opportunity Area - London Plan;
- Town centre uses - London Plan;
- Housing - London Plan; Housing SPG; the Mayor’s Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor’s Housing Strategy;
- Retail / Office - London Plan;
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy draft LPG; Optimising Site Capacity: A Design-Led Approach draft LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG;
- Fire Safety – London Plan; Fire Safety draft LPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; ‘Be Seen’ Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor’s Environment Strategy;
- Air quality - London Plan; the Mayor’s Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;
- Ambient noise - London Plan; the Mayor’s Environment Strategy;
- Transport and parking - London Plan; the Mayor’s Transport Strategy;
- Equality - London Plan; the Mayor’s Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Green Infrastructure - London Plan; the Mayor’s Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;

• On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found here. (Link to practice note).

**Land use principles**

15. The site is within the Lee Valley Opportunity Area (OA). As identified in London Plan Policy SD1 and Table 2.1, the Lea Valley OA has an indicative capacity for 21,000 new homes and 13,000 jobs.

Commercial and town centre uses

16. The site is partially located within the Tottenham Hale Town Centre. London Plan Policies SD6, SD7, SD8 and SD9 support mixed use development in town centres. Additionally, London Plan Policies E1 and E2 support new office provision and mixed-use development, with the focus on identified geographic areas and town centres; and states that new offices should take into account the need for a range of suitable workspace, including lower cost and affordable workspace.

17. The Site Allocation 'Ashley Rd South Employment Area' (Ref: TH6) envisages the wider site for an employment-led mixed-use quarter north of Tottenham Hale District Centre, with capacity for 444 homes and 15,300sqm of commercial floorspace

18. It is understood that approximately 6,500sqm of non-residential floorspace has been constructed, or is approved, as part of the other consented schemes within the Allocation.

19. The education floorspace of approximately 7,200sqm would no longer be delivered at this site; as the College is no longer coming forward. However, the proposals would include 6,359sqm of non-residential floorspace across the site, including an uplift of

approximately 1,800sqm (3,685sqm existing and 5,492sqm proposed) in Berol House compared to that consented. Ground level non-residential uses would provide welcome activation to the public realm. The increase in non-residential uses in Berol House is welcomed in contributing to the Site Allocation aim for a mixed-use quarter. The proposals would deliver significant qualitative improvement in the commercial space on the site; replacing low grade accommodation with high quality units designed to appeal to a range of prospective end users, which is supported.

20. The applicant stated that much of Berol House is vacant and many other tenants are on short-term leases, understood to include below-market rents. The intention is for some tenants to be rehoused in the new Berol House. Details of the relocation strategy should be included in any application.

21. The non-residential uses have been established through the extant permission and these uses remain strongly supported in principle.

#### Housing

22. London Plan Policy H1 sets out the requirements for boroughs to achieve the housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 15,920 homes for Haringey. Additionally, Policy H1 recommends that boroughs optimise the potential for housing delivery on brownfield sites, especially sites with public transport access levels (PTALs) of 3-6 or which are located within 800 metres of a station or town centre; and housing intensification on low-density sites in commercial, leisure and infrastructure uses.

23. The site comprises a significant development opportunity within the Borough and the proposed residential use on this under-utilised site, partly within a town centre and with very good public transport connections, is supported in principle. The uplift in residential use compared to the consented scheme is also welcomed, subject to resolution of matters raised in this report.

	<p>Summary</p> <p>24. The development of this brownfield opportunity area site for a high-density, mixed-use development is acceptable in principle.</p> <p><b>Housing</b></p> <p><u>Affordable housing</u></p> <p>25. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%. Schemes can follow the 'fast track' viability route and are not required to submit viability information nor be subject to a late stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; meet other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor; and demonstrate that they have taken account of the strategic 50% target and have sought grant to increase the level of affordable housing.</p> <p>26. London Plan Policy H11 and the Mayor's Affordable Housing and Viability SPG recognises the contribution of Build to Rent in addressing housing needs and increasing housing delivery, and establish a set of requirements for this tenure, which would need to be secured in the section 106 agreement for any permission, including:</p> <ul style="list-style-type: none"> <li>• The homes must be held under a covenant for at least 15 years (apart from affordable units, which must be secured in perpetuity);</li> <li>• A clawback mechanism must be put in place to ensure that there is no financial incentive to break the covenant;</li> <li>• The units must be self-contained and let separately;</li> <li>• There must be unified ownership and management of the private and affordable elements of the scheme;</li> </ul>	
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- Longer tenancies (three years or more) must be available to all tenants with break clauses for tenants;
- Rent and service charge certainty for the tenancy period on a basis made clear before the tenancy agreement is signed including any annual increases, which should be formula-linked;
- On-site management;
- Providers must have a complaints procedure in place and be a member of a recognised ombudsman scheme; and
- Providers must not charge up-front fees of any kind to tenants or prospective tenants outside of deposits and rent-in-advance.

27. London Plan Policy H11 states that where a Build to Rent development meets these criteria, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity. To follow the fast-track viability route, Build to Rent schemes must deliver at least 35% affordable housing, and the Mayor expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent, with the remaining 70% at a range of genuinely affordable rents. Schemes must also meet all the other requirements of Policy H5. Further guidance is provided in the Affordable Housing and Viability SPG.

28. The Haringey Local Plan states that 40% affordable housing is the expectation, with a tenure mix of 60% low-cost rent and 40% intermediate. However, the Tottenham AAP confirms that the housing priority in this area is for intermediate accommodation, due to the existing concentration of social housing in Tottenham. A portfolio approach has been used for the planning permissions across the masterplan area, whereby 35% affordable housing has been achieved with a tenure split of 70% intermediate, 30% affordable rent.

29. In terms of the applicant's own portfolio of sites in the masterplan area and planning applications, the applicant stated that 37% affordable housing has been achieved, and a breakdown has subsequently been provided. Within this, the previous consent for the wider site secured 14% affordable housing, which was agreed taking account of the

financial burden of the proposed College. It is understood that permission secured viability review mechanisms, including a late-stage review, which should have considered the removal of the College from viability considerations.

30. For the proposal site, 35% (by habitable room) affordable housing is proposed (refer to Table 1), which is welcomed, to be delivered at Discount Market Rent (DMR), of which 30% will be provided as London Living Rent (LLR).

31. The proposal would provide an uplift of 54 affordable homes above the extant planning permission (HYG/2017/2044).

32. Overall, 35% affordable housing is proposed as part of a Build to Rent scheme. The affordable housing would be Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track eligible. However, qualification for fast track is subject to the other caveats being met including securing the affordability, and other requirements listed under Policy H11, through the s106. An update will be provided at the Mayor's decision making stage.

### **Urban design**

33. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

### **Development layout**

34. London Plan Policy D3 states that development proposals should provide active frontages and positive relationships between what happens inside the buildings and

outside in the public realm to generate liveliness and interest. They should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to buildings.

35. The existing footprint of Berol House would largely remain unchanged whilst 2 Berol Yard would form a roughly square shape building to the east. This would allow for the creation of the new public space, Berol Square. The new position of Berol Square (compared to the previous permission) allows for the square to be activated by retail frontages and to become a destination point.

36. At pre-application stage, concern was identified regarding the southern footprint of the building which projects out with a 6 storey element, effectively narrowing the green link. The applicant stated that this is intended to mitigate against road noise from Watermead Way; however, this is not acceptable justification and increased planting for such aims it recommended. The route is considered too narrow and would not give the green link the prominence ascribed to it in the masterplan. Although a colonnade is proposed, the 6 storey element would be perceived as the end of the route, with only a narrow uninviting route continuing to Watermead Way.

37. The two buildings would also share an improved pedestrian street, known as Berol Walk, that would enhance the quality of the Green Link.

38. The layout of the residential building has been appropriately designed to maximise dual aspect thereby improving access to daylight and sunlight.

Height, scale, and massing

39. London Plan Policy D9 (Part B) states that tall buildings should only be developed in locations identified as suitable in development plans. Part C of Policy D9 also states that tall buildings must address their visual, functional, environmental, and cumulative impacts. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in Development Plans.

40. Tall buildings are defined in the Haringey Local Plan: Strategic Policies DPD as being buildings 10 storeys and over. Taller buildings are defined as those that are two to three storeys higher than the prevailing surrounding building heights.

41. Figure 2.2 in Haringey Council's Development Management DPD (July 2017) identifies the site as within the Tottenham Hale Potential Location Appropriate for Tall Buildings, although appropriate heights are not identified. As such, the proposal for a 30-storey (110.5 metre) residential building complies with the locational aspects of Part B of Policy D9. The 7 storey (20.8m) office building would not constitute a tall building.

Appropriateness of the site for tall buildings

42. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts.

Visual impacts

43. The context of the site has changed considerably in recent years as consented developments have been built out, with further sites under construction. The masterplan, as partly built out, clearly steps down from the Argent Related (38 storeys) and Hale Village (34 storeys) towers, both adjacent to the Station.

44. The applicant proposes a building of up to 30 storeys, made up of 5 massing blocks of 6, 18, 25 and two c.30 storey elements, around a central core. The proposed 30 storey elements would clearly be contrary to the masterplan generally reducing height along Watermead Way. Further refinement to the height of this proposal may be required in order to acceptably address the visual impacts of this building.

45. The site does not sit within any protected view corridor and the proposed buildings would not impede short or long range protected views.

Functional impacts

46. The functional impacts are generally considered acceptable in relation to the internal and external design, building materials as well as the maintenance and building management arrangements. The entrances and exit routes are well defined and the building constructions should not interfere with aviation routes. Lastly, consideration should be given to transport matters raised in the below transport section.

Environmental impacts

47. The applicant's technical information on microclimatic and environmental aspects is currently undergoing detailed review by the Council in order to assess the local impacts and identify whether additional mitigation measures are necessary to address these. This should include a full review of the potential daylight and sunlight impacts to neighbouring sites.

48. An update will be provided at the Mayor's decision-making stage.

Cumulative impacts

49. London Plan Policy D9(C) requires development proposals to address the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area. This assessment will be concluded at Stage 2.

Tall buildings conclusion

50. The proposal is located within an area that is identified as suitable for tall buildings. Whilst the functional impacts are generally acceptable in strategic planning terms, the matters discussed above with respect to visual, environmental and cumulative impacts need to be addressed. A full assessment of Policy D9(C) will be concluded at Stage 2.

Public realm and landscaping

51. Policy D8 states that development proposals should encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.

52. The applicant demonstrates consideration of access to public open space across the site, including Berol Square and Berol Walk with associated planting, in accordance with London Plan Policy G4.

53. As discussed above, the provision of the six-storey building would result in the provision of a narrow green link. This would not give the green link the prominence ascribed to it in the masterplan.

Architectural quality

54. London Plan Policy D3 states that development proposals should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.

55. The architectural design of 2 Berol Yard has proposed a materials palette which complements the surrounding context. The use of brickwork incorporating a range of brick colours is generally supported.

56. The three-storey extension to Berol House is considered to be a sympathetic addition to the existing building, through the use of terracotta tiling to provide a cladded façade, with double-glazed windows.

Fire safety

57. In line with Policy D12 of the London Plan the applicant has submitted a fire safety statement, prepared by a suitably qualified third-party assessor, AESG. This report

demonstrates how the development proposal would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. It is noted that the tall residential building would be provided with two staircases. Haringey Council is required to secure the proposed measures within an approved Fire Statement.

Inclusive access

58. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The applicant has submitted design and access statement which ensured that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation, or special treatment, and meets the requirements of paragraph 3.5.3 of Policy D5.

59. Haringey Council is required to secure the proposed measures with appropriate conditions.

**Transport**

Healthy Streets TA and Active Travel Zone (ATZ) Assessment

60. The applicant has provided a Healthy Streets TA and ATZ assessment as part of the submission document. The ATZ assessment has chosen several key routes from the site to an array of locations. However, it is recommended that amendments to the routes which should be carried out. This includes the inclusion of the nursery to the north of the site and exploring potential alternative routes to Cycleway 1.

61. It is also noted that the ATZ assessment has been carried out as a desk-based assessment. This method is no longer accepted, and it is requested that this is carried out on site as per TfL guidance.

62. Whilst the ATZ has highlighted some key improvements to the area, further scrutiny is required once the onsite assessment has been carried out. As part of the assessment, the applicant should consider routes to Cycleway 1 and assess whether it these meet the TfL Cycle Route Criteria and consider how the requirements could be met as a link.

63. Further discussions are required to consider the appropriate walking and cycling improvements that should be secured through legal agreement as necessary.

#### Vehicle, Pedestrian and Cyclist Access

64. There are several proposed pedestrian access points to the site from Ashley Road and Watermead Way. The application site will link up with proposed Green Link and it will also provide a new access route through Berol House – referred to as Berol Passage. This should be secured with 24hr access via the appropriate mechanism. Vehicular access is gained from Gessner Lane, which is deemed acceptable, but TfL has concerns over the management of this space which is discuss further below.

65. TfL has concerns over cyclist access points and how the site integrates into the wider cycling network. This will be discussed further in the detailed comments to the London Borough of Haringey.

#### Trip generation and impact

66. TfL requests that the applicant should conduct link load analysis of Tottenham Hale Station. The cumulative impact of all small-scale developments may cause major impact to the system. It is request that the applicant should provide the analysis based on NUMBAT 2019 data, with the scenarios of base, base + development and base + development + consented development.

#### Safeguarding and Infrastructure Protection

67. The applicant should demonstrate that the relevant consultation and safeguards have been put in place to safeguard adjacent London Underground, TfL Buses and rail infrastructure. It should be show that this is being considered during construction and following completion of the development.

Car parking

68. The applicant is proposing 7 blue badge parking spaces for 2 Berol Yard, which equates to 6 for the residential element and 1 for the retail element. This is London Plan compliant from the outset. However, the applicant has failed to identify potential future locations, should an additional 7% demand arise. The car parking for this element is located within an undercroft; TfL requests further information on how this is accessed, particularly for the residential space. For Berol House the applicant is proposing 1 blue badge space which is policy compliant.

69. TfL also notes that there are interim parking arrangements as part of the proposal. TfL request further details on this element and in particular the retention of parking spaces. This should be provided via a Parking Design and Management Plan (PDMP) and this should be secured via condition. Furthermore, all future occupants should be exempt from resident and business parking permits, and this should be secured via s106 agreement. Clarification is also sought on the levels of proposed Electric Vehicle Charging Points (EVCP's), which should be provided in accordance with the London Plan minimums.

Cycle parking

70. TfL has concerns over the quantum and design of the cycle parking. The quantum on the plans appears to be below London Plan minimum requirements. In addition to this, design does not accord with the London Cycle Design Standards (LDCS). Further detailed will be within the borough comments. Travel planning

71. The applicant has submitted an outline Framework Travel Plan for the site. Given the location of the site to public transport and potential links to the cycling network, it is

considered that the targets should be increased to reflect this. The final travel plan should be secured within the s106 agreement in accordance with London Plan policy T4.

#### Servicing

72. The applicant has provided an outline Delivery and Servicing Plan (DSP) which shows all vehicles apart from refuse, servicing the site via two loading bays on Ashley Road and Watermead Way and swept path analysis has been provided.

73. It is noted that the application would result in the creation of a private road, referred to as Gessner Lane. Only refuse vehicles would be able to service the site using the road, however clarification is sought on the management of this space. The final DSP should be secured by planning condition.

#### Construction

74. The applicant has provided an Outline Construction Logistics Plan (CLP). The plan should provide construction details including the expected number of trips, vehicle routing, working hours and practices. The applicant should commit to out of peak hours deliveries, particularly given the proximity of the site to Tottenham Hale Station. The applicant should also confirm the nearby bus stop will not be affected and confirm any potential footway closures.

75. The document should be secured by planning condition and TfL and other key London Underground Infrastructure colleagues should be consulted prior to any commencement of works.

#### **Sustainable development**

#### Energy strategy

76. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

77. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

- Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
- Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

78. For the domestic element, the development is estimated to achieve a 81% reduction in CO2 emissions compared to 2013 Building Regulations. For the non-domestic element, a 46% reduction is expected.

#### Whole Life-cycle Carbon

79. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

80. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2 and the applicant should review and respond to the accompanying WLC template (to be issued separately).

81. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website.

Circular Economy

82. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

83. The Applicant has submitted a Circular Economy Statement which is welcomed. However, it does not appear that the Applicant has submitted the completed GLA CE template.

84. Without the completed GLA CE template, the submission is missing some of the reporting tables. The Applicant should submit the completed GLA CE template in Excel format in line with the requirements of the GLA guidance.

85. Where the Applicant has replicated several of the reporting tables within the written report, comments have been provided based on the information received to date. Please refer to the attached document for detailed comments.

86. It is noted that some narrative in the written report is guided by the previous guidance version (Draft for Consultation, October 2020). The Applicant should update this narrative to reflect the relevant Circular Economy principles per the adopted (March 2022) guidance and its accompanying template and tables.

87. It is welcomed that the Applicant proposes to retain and refurbish the existing building on the site however there is additional information required across a number of areas.

88. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website.

Digital connectivity

89. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

**Environmental issues**

Urban greening

90. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. This includes the incorporation of biosolar green roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan. The site forms part of a new green link within the Tottenham Hale District Centre Framework and it is positive to see the proposed design puts this into practice.

91. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.35. The Planning Statement sets out that the proposals are an equal mix of residential and commercial, therefore it is considered that this application meets the target set by Policy G5 of the London Plan. This should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible.

92. The applicant should confirm that there are no existing trees to be removed to facilitate the proposed development. The applicant should also clarify the number of trees proposed.

Sustainable drainage and flood risk

Flood Risk Management

93. The site is located in Flood Zone 2. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from pluvial, sewer and groundwater flooding, which is considered to be low. The FRA provided for the proposed development generally complies with Policy SI12 of the London Plan. 94. A Flood Warning and Evacuation Plan (FWEP) will need to be prepared (secured by condition) including consideration of the identified risk of reservoir flooding.

Sustainable Drainage

95. Paragraph 8.4.8 of the drainage strategy proposes to restrict runoff to 5.7 l/s for the 100-year return period; however, paragraph 8.4.9 states the 'required attenuation to restrict the water flow to 17 l/s'; Microdrainage calculations in Appendix D use a restricted rate of 5.9 l/s. The proposed discharge rate needs to be consistent across the report and calculations. The proposed discharge rate should be restricted to the greenfield QBAR rate for all events up to the 100-year + 40% Climate Change. Correspondence with Thames Water confirming there is capacity to support the proposed flows should also be provided.

96. In terms of SuDS, the drainage strategy proposes green roofs, blue roofs and tree pits, which is welcomed. The strategy states that complexity, economic, and space constraints with the Proposed Development layout do not allow for the implementation of a rainwater harvesting system at the site. This is not considered appropriate justification. Every effort should be made to prioritise rainwater harvesting in line with the London Plan hierarchy.

97. The surface water drainage strategy for the proposed development generally complies with Policy SI13 of the London Plan.

Water Efficiency

98. No water efficiency information has been provided for the proposed development. This is not in line with Policy SI5 of the London Plan.

Air quality

99. An Air Quality Assessment has been prepared by WSP to accompany the planning application. The report has been reviewed and is of sufficient technical quality. However, the construction dust assessment has incorrectly labelled the magnitude of Trackout as 'large' instead of 'medium' based on 10 HDV outward movements and an unpaved road length of 50-100m. Whilst not correct, it is considered a conservative approach and thus acceptable.

100. The development is air quality neutral (London Plan Policy SI 1 (B) (2a)). The development is compliant with London Plan policies: • The development is partially located within an AQFA, and the assessment results and conclusions imply the constraints and impacts on the AQFA have been considered (London Plan Policy SI 1 (B) (2d)).

101. The following conditions are recommended:

- On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards (London Plan Policy SI 1 (D)).
- Measures to control emissions during the construction phase relevant to a medium risk site should be written into an Air Quality and Dust page 20 Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition

SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D))

#### Biodiversity

102. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.

103. It is recommended the applicant provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.

104. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved, if the proposed development is granted planning consent.

#### **Local planning authority's position**

105. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

#### **Legal considerations**

106. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor

may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

**Financial considerations**

107. There are no financial considerations at this stage.

**Conclusion**

108. London Plan policies on office, residential development, affordable housing, design, transport, sustainable development, and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- Land Use Principles: The development of this allocated, brownfield site for a high-density, mixed-use development is acceptable in principle.
- Affordable housing: Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant.
- Urban design: Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential overdevelopment.
- Transport: Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan.
- Sustainable development: Further information on Energy, Whole Life Carbon and Circular Economy is required to ensure full compliance with London Plan requirements.
- Environment: Further information is required on sustainable drainage, air quality and biodiversity.

	<p>The GLA Officer subsequently commented following sight of the latest QRP comments: GLA Officers are now generally satisfied that the urban design considerations in relation to height, massing, separation distances are appropriately resolved. Nevertheless, a full assessment against Policy D9 (including functional and environmental impacts) should be provided within the planning committee report and will be considered by GLA Officers at Stage 2.</p> <p>The GLA Officer subsequently commented: The whole life carbon matters and circular economy matters are, on balance, considered to be largely addressed. Whilst some minor points have been raised within the attached spreadsheets, I am satisfied that these matters are acceptably resolved in this circumstance and no further work is required on behalf of the applicant team. I would recommend that the WLC Assessment Report (dated 25/05/2023) and the Detailed Circular Economy Statement (dated 25/05/2023) be included as an approved document on the draft decision notice.</p>	
<p>Greater London Archaeology Advisory Service (GLAAS)</p>	<p><u>Assessment of Significance and Impact</u> Berol House and No.1 Berol Yard underwent historic buildings recording as a condition of the 2017 consent for conversion. The surviving loading hoist on the second floor of the south wing was identified as a significant feature.</p> <p>I recommend that the borough Conservation Officer's views be sought on the principle of the proposed impact on the historic fabric and the future of the loading hoist. I also recommend that the LPA secure measures for the public interpretation of the site's industrial history in an approved scheme, as encouraged by the London Plan. I would be pleased to advise the LPA further on this.</p> <p>The site lies in an Archaeological Area identified in the council's 2021 exercise, but I understand this work awaits adoption by LPA. I was not able to find an archaeological desk-based assessment accompanying the application.</p>	<p>Concern noted. The investigation can be carried out prior to development and any heritage assets found suitably displayed and recorded as necessary. Conditions and informatives achieve the asset protection.</p>

However, from a brief examination of superseded Ordnance Survey mapping, the site of the proposed new build appears largely undeveloped in the modern era. Its Enfield Silt geology preserve prehistoric and later activity elsewhere in the borough, including just to the south at Ferry Island and North Island. The First Edition OS shows a possible fossilised linear route, preserved as a parallel field boundaries and planting, crossing the site from Hale Farm which lies under Down Lane Recreation Ground, down to the Lea.

#### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

#### Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

**Condition**

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination, and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

**Informative**

Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

	<p>This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205. I envisage that the archaeological fieldwork would comprise the following:</p> <p><b>Evaluation</b>  An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality, and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.</p> <p><b>Refer to Conservation Officer</b>  As this proposal may affect a heritage asset of architectural, artistic, or historic interest so recommend that you seek the advice of your conservation officer.</p> <p><b>Public engagement</b>  A scheme of London Plan-compliant public heritage interpretation in public realm would be appropriate, secured through s106 and or design measures. I would be pleased to advise the LPA further on the industrial archaeological aspects of this</p>	
Thames Water	<p><b>Waste Comments</b>  There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our</p>	Noted, conditions and informatives included.

guide working near or diverting our pipes.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position for foul water networks but has been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "The development shall not be occupied until confirmation has been provided that either:- 1. All surface water network upgrades required to accommodate the additional flows from the development have been completed; or- 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan." Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://www.thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 20m of a Thames Water Sewage Pumping Station. Given the nature of the function of the pumping station and the close proximity of

the proposed development to the pumping station we consider that any occupied premises should be located at least 20m away from the pumping station as highlighted as best practice in our Codes for Adoption . The amenity of those that will occupy new development must be a consideration to be taken into account in determining the application as set out in the National planning Policy Framework (NPPF) 2019 at paragraphs 170 and 180. Given the close proximity of the proposed development to the pumping station we consider that it is likely that amenity will be impacted and therefore object. Not with standing this objection, in the event that the Local Planning Authority resolve to grant planning permission for the development, we would request that the following informative is attached to the planning permission: “The proposed development is located within 20m of a Thames Water Sewage Pumping Station and this is contrary to best practice set out in Codes for Adoption (<https://www.thameswater.co.uk/developers/larger-scale-developments/sewers-and-wastewater/adopting-a-sewer>). Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.”

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

#### Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place

other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.  
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at <https://www.gov.uk/government/publications/groundwater-protection-position-statements>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.

Supplementary Comments

	<p>Management of surface water from new developments should follow London Plan Policy SI 13 Sustainable drainage, subsection B (the drainage hierarchy). Typically, greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for surface water disposal as follows; Store Rainwater for later use &gt; Use infiltration techniques, such as porous surfaces in non-clay areas &gt; Attenuate rainwater in ponds or open water features for gradual release &gt; Discharge rainwater direct to a watercourse &gt; Discharge rainwater direct to a surface water sewer/drain &gt; Discharge rainwater to the combined sewer. Current surface water proposal is high for 1:1 and 1:30yr storm event.</p>	
<p>Transport for London</p>	<p>Comments are incorporated into the GLA response. However, the following further comments were received in relation to the WSP 'GLA Stage 1 – Response' dated 14<sup>th</sup> April 2023.</p> <p><u>Healthy Streets TA &amp; ATZ Assessment</u></p> <ol style="list-style-type: none"> <li>1. Yes, I way referring to the nursery to the north of the site, Bright Gem Nursery. It is acknowledged that there are highway improvements along Ashley Road to the junction of Burdock Road. However, the applicant has failed to include a nursery as part of the ATZ assessment, which residents of the site are likely to use. Without providing an onsite, on street assessment, it is poor standard to say that the existing situation is adequate.</li> <li>2. With regards to the link from the site to Cycleway 1 – please can the applicant highlight this as it is not clear which route is being referred to. If this link does exist, as per the stage 1 comments, an assessment of the quality of this route should be carried out.</li> <li>3. The applicant has failed to acknowledge that TfL do not accept desk-based ATZ assessment, and this should be carried out on site, and this will highlight any gaps and take in to consideration any commitment improvements already paid by the applicant. The ATZ assessment will allow TfL and the LB of Haringey to assess any potential improvements which will be in with the relevant planning tests where applicable.</li> </ol>	<p>Noted.</p>

Vehicle, Pedestrian and Cyclist Access

1. Access via Berol Passage should provide 24hr access 365 days a year and this should be secured via the S106. Additionally, TfL have concerns that 'permissive path rights' of access fall outside the Public London Charter with potential restrictions to access. All other routes should be public right of way, and this should be secured.

Trip Generation

1. The request is in order to understand the various differing impact of the extant permission and proposed application. This development is likely to impact the transport network in a different direction to that of the previous application and this needs to be assessed and understood, therefore please provide a relative impact assessment in each direction.
2. With regards to the WFH situation, evidence from TfL Travel in London report <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports> sets out the current observed position more generally. Our strategic models are based on longer term assumptions about home working, and planning decisions are based on that longer view. Also, there is a different people home working on the day of the Census, and emerging pattern of hybrid working as set out by TfL.

Safeguarding and Infrastructure Protection

1. Noted.

Car Parking

1. The applicant has failed to clarify access for residential and commercial blue badge spaces in the undercroft, for example would this space be open or be access via a remote control?
2. Note the provision for potential future blue badge spaces. Albeit the applicant should demonstrate how this public realm could be prevent from being used as 'informal' parking given the space.
3. The reduction in parking on site from existing tenants should be clarified.

	<p>4. Welcome the commitment to provide 100% active electric vehicle charging points. This should be secured appropriately.</p> <p><u>Cycle Parking</u></p> <p>1. The design is noted, but the access to the long stay cycle parking is still deemed as being non LCDS compliant.</p> <p><u>Travel Planning</u></p> <p>1. Noted.</p> <p><u>Servicing</u></p> <p>1. Noted.</p>	
<p>London Underground/DLR Infrastructure Protection</p>	<p>Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure.</p> <p>Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.</p> <p>1. Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none"> <li>a) provide demolition details</li> <li>b) accommodate the location of the existing London Underground structures</li> <li>c) accommodate ground movement arising from the development construction thereof</li> <li>d) mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures</li> <li>e) provide details on the use of tall plant/scaffolding for the demolition phase</li> </ul>	<p>Noted, conditions included.</p>

- f) demonstrate that any EMC emissions from any plant or equipment to be used on the site or in the finished structure will not adversely affect LU equipment or signalling
- g) demonstrate that the design allows for any emissions from London Underground's tunnel, tracks and ventilation shafts or emissions from the proposed development
- h) written confirmation will be required from Thames Water/whomever that any increased drainage or sewage from the site will not be discharged directly or indirectly into London Underground's drainage system.

2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) prior to commencement of each phase of the development provide details of foundations, basement, and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent)

3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) provide details on the use of tall plant/scaffolding

**Reason:** To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

Your proposal is also adjacent to Network Rail and Crossrail 2. Please contact them directly to query what affect, if any, the proposal will have on the railway.

*This response is made as LU/DLR Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore*

	<i>relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities</i>	
Health and Safety Executive	<p>Headline response from HSE – ‘content’</p> <p><b>Scope of consultation</b></p> <p>1.1. The above consultation relates to a relevant building of 30 storeys, with a maximum storey height of approximately 100m served by two staircases.</p> <p>1.2. The fire statement states that the adopted fire safety standards are British Standards 9999:2017 and Draft BS9991:2021. It should be noted that the draft BS9991 is a consultation draft document which cannot be used as a design guide. HSE can only assess applications based on extant standards and, accordingly, has assessed the application in accordance with BS9991:2015.</p> <p><b>Previous consultation</b></p> <p>1.3. HSE issued a pre-application advice note dated 26/09/2022 following a pre-application consultation meeting between the applicant and HSE held on 26/09/2022.</p> <p>1.4. Following a review of the information provided with this consultation, HSE is content with the fire safety design, to the extent that it affects land use planning.</p> <p><i>The following information does not contribute to HSE’s substantive response and should not be used for the purposes of decision making by the local planning authority.</i></p> <p><b>Means of Escape</b></p> <p>2.1. Drawings show both staircases in close proximity opening into a shared lift lobby. The fire safety design standard, BS9991, states: ‘Where two or more common stairs are provided they should be located such that they are situated remotely from each other.</p>	<p>The introduction of the additional stair and evacuation lift has resulted in the HSE being content with the proposals in terms of escape in the event of fire.</p> <p>The applicant has responded to these points and advises that they will develop the strategy as they move into more detailed design stages.</p> <p>The conditions would ensure that the commitments made in the submitted statements are realised.</p>

	<p>Where a common corridor connects two or more storey exits, measures should be provided to prevent both stairs from being affected by the smoke from a single fire’.</p> <p>2.2. It will be for the applicant to demonstrate that both staircases can not be compromised by fire and smoke concurrently. In this instance, however, any necessary internal alterations are unlikely to affect land use planning considerations. This will be subject to scrutiny at later regulatory stages.</p> <p>2.3. Similarly, section 7 of the fire statement indicates that evacuation lifts will be provided. It will be for the applicant to demonstrate that a tenable atmosphere will be provided for people waiting to use evacuation lifts. In this instance, however, any necessary internal alterations are unlikely to affect land use planning considerations. This will be subject to scrutiny at later regulatory stages.</p>	
Natural England	<p>Thank you for getting in touch about the above consultation, please find Natural England’s response below.</p> <p>Natural England has no comment on this application with regards to designated sites.</p> <p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species, or you may wish to consult your own ecology services for advice.</p> <p>Environmental gains Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:</p>	Noted

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's Biodiversity Metric 3.1 may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the Small Sites Metric may be used. This is a simplified version of Biodiversity Metric 3.1 and is designed for use where certain criteria are met. It is available as a beta test version.

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside Biodiversity Metric 3.1 and is available as a beta test version.

#### Green Infrastructure

Natural England's Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI) . GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

	<p>Development should be designed to meet the 15 Green Infrastructure Principles. The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.</p> <p>GI mapping resources are available <a href="#">here</a> and <a href="#">here</a>. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.</p> <p><b>Access and Recreation</b>  Natural England encourages any proposal to incorporate measures to help improve people’s access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.</p> <p>It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision-making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available <a href="#">here</a>.</p>	
<p>NHS North  Central London</p>	<p>Thank you for consulting the NHS North Central London Integrated Care Board (NCL ICB) regarding the planning application HGY/2023/0261. The NHS Healthy Urban Development Unit supports the London ICBs engage in the planning process.</p>	<p>Noted, proportionate health contribution sought through S106 obligation.</p>

We have reviewed the planning application and broadly welcome the proposal. However, we have significant concerns regarding the impact on health infrastructure. The Health Impact Assessment (Lichfields) submitted as part of the application documentation identifies the impact on health infrastructure as the only area where there is a clear adverse impact which requires mitigation. Paragraph 6.5 advises “this effect will be mitigated through CIL and/or Section 106 contributions to support existing healthcare facilities in the local area”. Unfortunately, the HIA only considered primary care rather than the full range of health infrastructure which will be impacted.

The NHS HUDU Planning Contributions Model (HUDU Model) as set out in Chapter 11 of the 2021 London Plan has been used to calculate the cost of mitigation for inclusion within the s106 agreement. The applicant refers to the development when complete accommodating 470 residents. However, in running the HUDU Model we have assumed that there will be a proportion of residents moving locally although new residents will be moving into those homes vacated. This may underestimate the new population with a figure of 335. Should the Council have local information regarding allocations policy and who is moving into the borough we could review this figure. The summary figures from the Model are included in the table below. We are not seeking the revenue costs although it is important to recognise that there will be additional revenue costs incurred by the NHS.

<b>Final Summary</b>	
Total Capital Cost	£547,397
Total Revenue Cost	£497,490
Combined Cost	£1,044,887
Total Number of Housing Units	210
Capital Cost Requirement Per Unit	£2,607

	<p>Using information on the proposed housing mix in the Planning Statement, the model calculates the healthcare s106 requirement of £547,397 which includes primary care as well as acute and mental health capacity needs. However, with the planned space at the new Welbourne Centre it is hoped that additional capacity can be provided with reconfiguration and upgrading of existing sites, and therefore we ask for a minimum s106 contribution of £233,335 to “increase capacity of health infrastructure serving the proposed development”. In the event that further capacity is required from this and other schemes in this part of the borough we would welcome discussions with the Council in relation to potential CIL funding.</p>	
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**Appendix 4: Neighbour representations**

Stakeholder	Objection/Support/Comment (summarised)	Response
<p><b>Neighbour representations</b></p>	<p>Comments/objections have been received in relation to scale of the proposed building (Berol Yard) in relation to Berol House.</p>	<p>As set out in in section 6.6 the proposal is on a site suitable for a tall building and the design having been reviewed by the QRP is considered to be high quality.</p>
	<p>Comments of support have been received in relation to the proposed development helping to make Tottenham more of a destination location within London and contribution to the redevelopment of Ashley Road. Neighbour representations also welcome the addition of high quality retail and office floorspace to create a more vibrant atmosphere in the area.</p>	<p>Noted.</p>

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## **MINUTES OF PLANNING SUB COMMITTEE MEETING HELD ON MONDAY, 7TH NOVEMBER, 2022, 7.05 - 9.20 PM**

### **1. FILMING AT MEETINGS**

The Chair referred to the notice of filming at meetings and this information was noted.

### **2. PLANNING PROTOCOL**

The Chair referred to the planning protocol and this information was noted.

### **3. APOLOGIES**

Apologies for absence were received from Councillor Nicola Bartlett.

### **4. URGENT BUSINESS**

There were no items of urgent business.

### **5. DECLARATIONS OF INTEREST**

There were no declarations of interest.

### **6. PRE-APPLICATION BRIEFINGS**

The Chair referred to the note on pre-application briefings and this information was noted.

### **7. PPA/2022/0019 - HIGHGATE SCHOOL, NORTH ROAD, LONDON, N6 4AY**

The Committee considered the pre-application briefing for a series of planning applications for the re-development of the Highgate School sites as follows:

#### Dyne House and Island Site

Redevelopment of Dyne House, to include:

- 1) Retention, refurbishment and extension of the principal five storey (plus plant and lift over run) Dyne House building;
- 2) Demolition and redevelopment of the rear extension and associated buildings with part one, part two storey structure;
- 3) Retention of the Parade Ground open space, with new sports pitch surface;

- 4) Associated improvements to the Island Site access and underground tunnel, including demolition and redevelopment of service block; and
- 5) Associated landscaping and improved provision for emergency services, servicing and disabled parking.

### Science Block

Refurbishment and extension of existing Science Block, to include:

- 1) Four storey plus basement extension to east wing to provide new entrance and improved circulation, lift and ancillary accommodation, and internal replanning/alterations;
- 2) Two storey extension above ground level colonnade to central building, to provide internal re-planning and additional teaching accommodation;
- 3) Creation of additional plant space at roof level of the East Link Block;
- 4) Complete replacement of building systems/plant;
- 5) Rooftop observatory extension;
- 6) Replacement windows and restoration of existing facades; and
- 7) Associated landscaping.

### Richards Music Centre

Redevelopment of Richards Music Centre, including complete demolition of existing structure and development of a replacement building of two and a half storeys plus basement, and associated landscaping with improved provision for emergency services, servicing and disabled parking.

### Mallinson Sport Centre

Redevelopment of Mallinson Sport Centre, to include:

- 1) Partial demolition of existing structure, squash and fives court buildings;
- 2) Refurbishment and extension of the remaining facilities, comprising new part single basement, new double height sports hall and new entrances, new teaching classrooms, offices, gym and exercise studios, circulation and ancillary accommodation;
- 3) New basement level outdoor covered fives courts;
- 4) External sunken oval sports pitch; and
- 5) Associated landscaping and improved provision for emergency services and servicing.

### Decant Facility

Installation of a single storey modular classroom facility, on a temporary basis, for a period of up to six years; associated means of enclosure, footpaths and landscaping; complete reinstatement of the synthetic surface upon cessation of use.

### Far Field

Engineering and groundwork operations to relevel existing playing surface and improve drainage including installation of a synthetic turf pitch, creation of biodiverse

margins, new emergency and service access and refurbishment of existing changing pavilion.

The applicant team and officers responded to questions from the Committee:

- The applicant team noted that, in response to the Quality Review Panel (QRP) recommendation about further analysis of the potential for overheating on the science block extension, their engineers had undertaken some investigations.
- It was noted that some residents had expressed concerns that there would be increased student numbers at the school. The applicant team explained that the school currently had 1,930 students and had a maximum licence for 1,970 from the Department for Education. It was noted that the works would improve the existing spaces for the existing students but that there was no intent to increase numbers as other spaces, such as the dining area, could not accommodate additional students.
- In relation to Metropolitan Open Land (MOL), it was noted that the principal incursion from the development on to MOL was shown in the full plans and would be included as part of the application. The applicant team noted that they had worked closely with the Greater London Authority (GLA) and believed that the development would qualify as an excepted use. It was explained that the applicant team did not believe that the development would impact on the openness of MOL and would increase opportunities for sport. In addition, they were relying on the fact that MOL had been re-released and that there would still be more MOL than when the area was originally designated.
- It was enquired whether the applicant would have to demonstrate that the development met special circumstances test in order to develop on MOL. The applicant team did not believe that the scheme would be required to meet the special circumstances test as it provided additional sporting opportunities without impacting the openness of MOL. If, for any reason, the development did not qualify as an excepted use, the justification would include the important need for modernisation and a flexible curriculum which was not possible on the current site and that the site would involve community uses.
- It was noted that significant engagement had been undertaken as part of the scheme which had resulted in a number of changes to the proposals. It was commented that the narrative of the engagement history would be set out in full in the Statement of Community Involvement (SCI).
- It was noted that there were still cadets at the school but there were lower numbers of participants and they no longer required the large parade ground which was now used as a playspace during breaks.
- Some members raised concerns about the sustainability of the proposed artificial (astro) pitch and its impact on the local environment. The applicant team commented that the scheme aimed to make the site more useable and that grass areas for sport would experience lasting soil damage if used in the winter. It was stated that the application would be providing a net gain in biodiversity throughout the estate and that significant detail about the impact of the development would be included with the application.
- In relation to the effect of the development on the area and community access to facilities, the applicant team stated that there had been engagement with the local community, including other schools. Following some discussions on traffic and events, the location of theatre and drama had been moved so that it would be easier for the community to use and would have a reduced noise impact. It was

noted that there was no plan to monetise the new buildings but that they would be open for community use. It was added that there was expected to be use of the facilities by other schools, particularly for sports, and that the majority of this activity would take place during school hours which would have a reduced impact on the community.

- In relation to the decant arrangements for development, the applicant team noted that the proposed temporary facility was located at Bishopswood Road. This site had an existing foundation so would involve less embodied carbon and was separated from residential and key Listed buildings. It was added that the layout of the temporary facility could be adapted, including classroom and laboratory layouts, depending on what was being developed at the school.

The Chair thanked the applicant team for attending.

## **8. PPA/2020/0002 - 505-511 ARCHWAY ROAD, LONDON, N6**

The Committee considered the pre-application briefing for the redevelopment of existing car-wash site to provide 16 new homes for Council rent comprising a part three, part four-storey apartment building fronting Archway Road, and two houses fronting Baker's Lane with associated refuse/recycling and cycle stores, amenity space and landscaping. Provision of one on-street wheelchair accessible parking space and service lay-by on Archway Road.

The applicant team and officers responded to questions from the Committee:

- Some members asked about accessibility; it was noted that the site was located on the gyratory, that there would only be one blue badge parking space, and that the nearby crossing points were not zebra crossings or traffic lights. The applicant team noted that an accessibility consultant had been involved in the scheme and it was considered to be fully accessible. It was added that a detailed report would be available in the application documentation.
- It was explained that an existing layby on the road would be a dedicated blue badge parking space. Transport for London (TfL) did not generally permit dedicated spaces in these situations but had acknowledged the importance in this case.
- Some members suggested that the bicycle lane on the gyratory should be protected and it was enquired whether the applicant or officers could further discuss this with TfL. The applicant team explained that this would be pursued but was unlikely to be successful. It was noted that the proposals for the site should not prevent future changes if they were agreed by TfL.
- Some members noted that the proposal would be for 16 new homes at council rent and it was enquired what this meant in planning terms and what sort of weight the Committee should give to this. The applicant team noted that the financial appraisals had been undertaken for social rent, also known as target rent, and that no other form of rent was being considered; the Head of Development Management explained that the Section 106 legal agreement would be drawn up on this basis. In terms of the weight in decision making, the Head of Development Management noted that this was a matter of discretion but that council rent was classified as a type of affordable rent and that it would be reasonable for the Committee to take affordability into account as part of its decision making. It was

noted that there was no specific guidance that this should be given more or less weight. It was confirmed that council rent meant formula rent in this case.

- It was clarified that there would be no change to the adjacent red route and that the loading bay and parking bay would be monitored by TfL Closed Circuit Television (CCTV).
- The applicant team clarified that a landscape architect was designing a play area for under fives on the site. The amenity space was being designed to comply with the required standards and would be provided at ground floor level; full details would be included as part of the application.
- Some members drew attention to the other buildings that had been used as inspiration and queried whether the proposal should include some more detail, such as pitched or mansard roofing. It was suggested that it would be beneficial for the design of the proposal to be more distinct to reflect its context as a prominent entrance point to Haringey. The applicant team explained that they had undertaken a lot of design and conservation work in designing the scheme. Further work would continue before the application was submitted and it was hoped that the Committee would find the design acceptable. It was highlighted that flat roofs were sometimes required in order to meet Passivhaus low energy design standards.
- Some members provided comments that the units would benefit from avoiding letterboxes on external walls, good design of the lobbies which allowed easier maintenance, and reversible windows that could be cleaned from the inside. It was also requested that the application set out whether the units would have open plan kitchens or separate kitchens and how many units would be single aspect.
- The applicant team commented that they would be securing a minimum of 'Good' for designing out crime and would be aiming for 'Outstanding'.
- In relation to the impact of noise and pollution for residents of the site, the applicant team noted that detailed scientific research had been undertaken and that the results would be included with the application. It was explained that there would be mechanical ventilation on site and the levels of pollution were predicted to be similar to other, urban schemes. It was added that the principal rooms for the units would face inwards, to the garden area, rather than to the road.

The Chair thanked the applicant team for attending.

At 8.30pm, the Committee agreed a brief adjournment. The meeting resumed at 8.35pm.

**9. PPA/2022/0012 - 'BEROL QUARTER', BEROL YARD, ASHLEY ROAD, TOTTENHAM HALE, N17 9LJ**

The Committee considered the pre-application briefing for:

Berol House

Refurbishment of Berol House (c. 3,300sqm) for a mix of flexible commercial & retail floorspace with 3-storey extension (c. 2,200sqm) at roof level.

## 2 Berol Yard

2 Berol Yard would comprise a part 6, part, part 18, part 25, part 29, part 30 storey building with lift overrun core incorporating c. 210 Build to Rent (BTR) homes with a mix of flexible retail & commercial floorspace at ground floor level with community floorspace and enabling works for a bridge connection over Watermead Way & the railway line to the east.

The BTR accommodation will include 35% affordable housing by habitable room including homes let at London Living Rent (LLR) and Discount Market Rent (DMR).

The proposal would include associated public realm works and landscaping within the quarter which would include a public square.

The applicant team and officers responded to questions from the Committee:

- With no objection from the applicant team, some members of the Committee shared a picture of the site from the historical archives. It was requested that the applicant considered restoring the windows on the site to replicate the original windows. The applicant team noted that all windows would be replaced; the detail would be considered very carefully and it would be aimed to find the best alignment between the old and the new.
- Some members of the Committee raised concerns about the viability of build to rent in the area. The applicant team noted these concerns but stated that there was currently a good degree of interest in the Tottenham Hale area.
- The applicant team commented that they had used Haringey Council's Building Control previously and were likely to use them for this scheme.
- Some members commented that the names for proposals should be named after those who were known to local people.
- In response to a query about the plans for a digital university on the site, the applicant team noted that they were disappointed that this had not been possible. It was explained that they had worked with the Department for Education (DfE) and the Greater London Authority (GLA) but that the specific conditions of the funding requirements could not be met. It was added that the site had been marketed for academic use for 32 months and had been marketed to the science and technology industries with no success.
- The Committee asked about the design and colour of the proposals. It was noted that the window detailing had been carefully considered; the proposed design was thought to have a good, industrial quality to the metalwork and both buildings would have the same colour of metal. In relation to the colour choices, the applicant team explained that they had considered using one colour throughout but that, as this was the last piece of development in the area, it was possible to directly reflect the colours of the surrounding buildings and this was considered to be more appropriate.
- It was confirmed that all spaces in the scheme would be available to all residents. It was also noted that there would be community space as part of the proposal which would overlook the square and public art space.
- Some members commented that there would be a large influx of population into the area and enquired about the provision of wider welfare facilities and spaces, such as sports areas. The applicant acknowledged the importance of wellbeing and the variety of spaces and activities that were involved. It was noted that the

scheme would be designed to make the public realm functional. It was added that, as part of the wider picture, there had been stakeholder work with sports groups in the area in relation to the redesign of Down Lane Park.

- The Committee asked about the number and direction of single aspect units and whether this would be reduced in the final proposals. The applicant team commented that they did not have precise figures to hand but that there would be more detail in the full Design and Access Statement. It was noted that the design of the buildings, which rose higher and pulled away from surrounding buildings, would provide good visible sky, or Vertical Sky Component (VSC), figures and, although this did not count as dual aspect, the proposed recessed balcony rooms would provide good quality living arrangements.

The Chair thanked the applicant team for attending.

**10. UPDATE ON MAJOR PROPOSALS**

The Chair noted that any further queries could be directed to the Head of Development Management.

**RESOLVED**

To note the report.

**11. NEW ITEMS OF URGENT BUSINESS**

There were no items of urgent business.

**12. DATE OF NEXT MEETING**

It was noted that the date of the next meeting was 29 November 2022.

CHAIR: Councillor Barbara Blake

Signed by Chair .....

Date .....

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**CONFIDENTIAL****Haringey Quality Review Panel****Report of Formal Review Meeting: Berol Quarter Phase 2**

Wednesday 13 July 2022

Berol House, 25 Ashley Road, London, N17 9LJ

**Panel**

Peter Studdert (chair)

Esther Everett

Louise Goodison

Andy Puncher

Craig Robertson

**Attendees**

Philip Elliot London Borough of Haringey

Suzanne Kimman London Borough of Haringey

John McRory London Borough of Haringey

Richard Truscott London Borough of Haringey

Joe Brennan Frame Projects

Sarah Carmona Frame Projects

**Apologies / report copied to**

Aikaterini Koukouthaki London Borough of Haringey

Rob Krzyszowski London Borough of Haringey

Robbie McNaugher London Borough of Haringey

Elizabetta Tonazzi London Borough of Haringey

Deborah Denner Frame Projects

**Confidentiality**

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

**1. Project name and site address**

Berol Quarter, Ashley Road, London, N17 9LJ (within the Ashley Road South Masterplan)

**2. Presenting team**

Jonathan Carkeet	Berkeley Square Developments
Malcolm Lea	Berkeley Square Developments
Paul Eaton	Allies and Morrison
Helena Gomes	Allies and Morrison
Angie Jim Osman	Allies and Morrison
Jasmin Lewin	John McAslan + Partners
Aidan Potter	John McAslan + Partners
David Finch	Churchman Thornhill Finch
Jonathan Hoban	Lichfields
Ben Kelway	Lichfields
Joshil Hirani	WSP
Silke Mason	WSP

**3. Aims of the Quality Review Panel meeting**

The Quality Review Panel provides impartial and objective advice from a diverse range of experienced practitioners. This report draws together the panel's advice and is not intended to be a minute of the proceedings. It is intended that the panel's advice may assist the development management team in negotiating design improvements where appropriate and in addition may support decision-making by the Planning Committee, in order to secure the highest possible quality of development.

**4. Planning authority briefing**

The application site falls within site allocation TH6 – Ashley Road South (as noted in the Tottenham Area Action Plan 2017). The site is allocated for the creation of an employment-led mixed-use quarter north of the new District Centre, as well as for facilitating a key part of the strategic east-west green route linking Tottenham High Road with the Lea Valley Regional Park. Development should also provide an enhanced public realm for Ashley Road. The allocation states that residential use will be permitted to cross subsidise improvements to employment stock. The Berol Quarter site sits within the central and southern eastern sections of the Ashley Road South Masterplan (ARSM) and covers an area of 1.02 hectares. The site forms part of the wider Berol Yard site.

Planning permission realised the site allocation with a hybrid application being granted that included the retention of Berol House, with outline proposals (all matters reserved) for the alteration/conversion of ground, first and second floors of Berol House with up to 3,685sqm of commercial floorspace and the introduction of a two-storey roof level extension introducing up to 18 residential units. In addition, the planning permission also included the erection of two buildings between 8 and 14



storeys providing 166 build to rent (BTR) residential units, 891 sqm of commercial floorspace and 7,275sqm of education floorspace.

The works to Berol House and the new building hosting the educational floorspace (meant for ADA as a National College of Digital Skills (NCDS)) has not come forward; however, the BTR residential building known as The Gessner and associated landscaping has been constructed and delivered. The panel has reviewed the proposals (and those for adjacent sites and the overall masterplan) a number of times since 2017.

In the context of the transformative regeneration experienced to date within the area – alongside the failure to secure another educational institution for the site – the current proposals for the Berol Quarter development comprise a mixed-use commercial and residential scheme covering 2 Berol Yard and Berol House. It is intended to complement emerging neighbouring developments in Tottenham Hale and to complete the Ashley Road South masterplan. The scheme would deliver around 200 homes, in the form of build to rent accommodation, and 500sqm of employment-generating floorspace at 2 Berol Yard, up to approximately 34 storeys. This development is alongside the refurbishment of around 3,800sqm of existing commercial floorspace and the addition of circa 2,000sqm of new additional accommodation at Berol House for employment space, as well as associated public realm and landscaping within the quarter.

Officers seek the panel's view on the design quality, scale and massing of the proposals, including the associated public realm and landscape, and all interfaces between public and private realms.

## **5. Quality Review Panel's views**

### *Summary*

The Quality Review Panel welcomes the opportunity to review the proposals for the Berol Quarter at an early stage, and thanks the project team for the informative presentation. It is warmly supportive of the proposals for Berol House, subject to continued development of the details of the design. This should include work to clarify routes and openings, permeability, and ground floor uses. Further consideration should also be given to the expression, materiality and form of the proposed additional floors at roof level. This should be tested and illustrated within key views. Design for thermal performance and environmental sustainability should underpin the design of the new elements, and the refurbishment and repurposing of the existing elements: the panel would like to see Berol House become an exemplar for environmentally sustainable design and refurbishment.

The panel is unable to support the proposals for 2 Berol Yard and feels that a building of this scale and mass is not appropriate for the Berol Quarter. A more appropriate development should be explored that more closely references the 12-14 storey scale of the neighbouring buildings, as well as being more sensitive to the privacy and outlook of nearby flats in The Gessner. Microclimatic impacts at ground level, as well



as the environmental and thermal performance of the building should be carefully assessed. A key objective should be the creation of a distinctive and high-quality place, with a comfortable pedestrian environment, while ensuring that the development does not have a negative impact on the local neighbourhood. Reinforcing and facilitating the east-west green link within the site will be important, as will integrating the proposed pedestrian footbridge across Watermead Way and the railway. The panel would expect the development to facilitate the pedestrian bridge with a financial contribution.

#### *Scope of the review*

- Due to time constraints, the scope of the review was primarily at a strategic level. It is anticipated that the panel will consider the evolving proposals at a greater level of detail in future reviews.

#### *Overall vision for Berol Quarter*

- The panel notes that there is a tension between the strategic and local visions for the site. The current proposals for 2 Berol Yard seem to have been developed from the perspective of an arbitrary long distance view, rather than an understanding of how the development will be experienced at a local level: how the buildings shape the experience of the place. The panel feels that this local experience should inform and drive the early, strategic decisions about the massing and three-dimensional form of the new building.
- The panel would like to know more about the detailed vision for Berol Quarter, and what will make it a distinctive place. It highlights that a large part of the public experience is influenced by the design and quality of the public realm, and it notes the challenge of mitigating the hostile environment of the major roads adjacent to the site.

#### *Berol House*

- The panel welcomes the approach taken to repurposing the Berol House building; it is socially important, linking the existing and new communities, and could become an exemplar. It is an extraordinary building and presents a great opportunity to provide a focus for the masterplan.
- The reworked scheme is generally well-considered; the panel supports the move to make the ground floor more permeable and thinks that some further exploration of how this might be achieved would be beneficial. Options to consider include the creation of a central 'arcade', increased permeability through the ground floor uses with entrances on both facades, and a clear hierarchy of the routes through the building.
- Including some community uses at ground floor level could also help to integrate the different local communities within the new development; retail provision may not be particularly accessible for a wide demographic.



- Provision for flexibility in the size of units will also be important, so that Berol House can adapt to a wide range of occupants.
- The panel would encourage the project team to tease out and reinforce the 'delight' in the architectural expression of the heritage building. The original form was that of a central building with clear bookends, so visually reinforcing these and reflecting details like the false tromp l'oeil doorway into the stairwell at roof level would be welcomed. The Colourworks building in Ashwin Street, Dalston is a good example of a successfully repurposed industrial heritage building.
- The panel is not yet convinced by the architectural expression of the proposed additional storeys at roof level. A lighter and more delicate approach may be more appropriate; the current images render the uppermost storeys visually heavy. While the addition of two new storeys on the roof works well, the third, set-back level needs a lighter touch, including a more defined setback on its eastern face to avoid a sheer three storey roof addition facing Berol Yard.
- Designing for thermal performance and sustainability should underpin the approach to the form and expression of the new-build upper floors. Factors for consideration include solar gain, daylight and sunlight, embodied carbon and the LETI standards.
- The panel notes that the wall-to-ceiling glazing, and generally the quantum of glazing, would be detrimental in terms of thermal performance and solar gain / overheating. A holistic evaluation of the impact of the cladding material would also be welcomed.
- The panel would encourage the project team to explore innovative forms of construction on the upper floors, and to take environmentally sustainable design as a starting point, both in the new-build roof additions, and with the refurbishment and retrofitting of the existing building.

## *2 Berol Yard*

- High quality placemaking should be the key driver for the Berol Quarter development and careful consideration should be given to what characteristics will make it a distinctive and liveable place.
- The panel thinks that the proposed height and mass of the building, in terms of the impact upon the public realm and adjacent buildings, is unsuitable in this location, which has been identified as the 'final piece of the jigsaw' of the Ashley Road South Masterplan.
- Further consideration of the massing and height is therefore needed, to increase and improve the amount of open space on the site, while framing the



space and the spaces to which it links. In addition, extensive wind modelling will be required.

- The building height should relate more closely to the scale of buildings immediately adjacent, at 12-14 storeys, although some additional height could potentially be justified if the development clearly facilitates and contributes to the implementation of the proposed pedestrian bridge and its landing area. However, the design and integration of the landing area will be critically important in this regard.
- It will be important to define a clear brief for how the building should work, in terms of orientation, daylight, sunlight, wind modelling and microclimate, which can drive the iterative design process.
- Constraints within and around the site are also important and should also underpin the developing design. The 12m gap to The Gessner building to the north is very problematic, resulting in north-facing single aspect units with reduced daylight, as well as obstructing the outlook and amenities of the south-facing balconies on The Gessner. A different response to these constraints could result in a narrower, more compact building, without single aspect units.
- The panel notes that the Victoria line tunnel also presents constraints for construction above it. It wonders whether adoption of a diagonal in the building line at the northern façade could open up the 12m gap, improve access to daylight for the accommodation, and improve neighbourliness.
- The panel would encourage the project team to consider future adaptability of the proposed building; it notes that 'build to rent' may become less appropriate in 20 years' time.
- The panel also expresses some concerns about the proposal to locate parking at the 'back of house', adjacent to Watermead Way.

#### *Place-making, public realm and landscape design*

- The overarching vision of a green link (from the High Road to the Tottenham Marshes and Lee Valley Regional Park) is a very important strategic initiative for the local area. The panel would like to see how this can be further reinforced and enhanced, giving character and distinctiveness to the development. For example, greater provision of soft landscape could be made within the site and key elements of the link could be integrated within the proposals, including the potential pedestrian bridge over Watermead Way and the railway. The panel would expect to see this type of greening strategy illustrated within the CGI views of the scheme.



- The current proposals for 2 Berol Yard are not at a human-scale at ground level, and the panel would like to see refinement to the design of the lower part of the building and the public realm to humanise the scheme and to provide protection from the challenging microclimate, and major road adjacent.
- The panel would like to know more about both the strategic and detailed approaches to landscape within the Berol Quarter, especially in terms of how these spaces might be used by children, and how the different spaces will be used by different age groups.
- The panel would expect the development to make a financial contribution to facilitate the connections that form part of the green link, in particular the proposed footbridge.
- The cafes on the waterfront at Hale Wharf, the Tottenham Marshes and Lee Valley Regional Park are important destinations, both for the development itself and for the wider community. The panel notes that there are still uncertainties about the detailed design of the footbridge because of Crossrail 2; however, it feels that the scheme needs to show how this link will be made.

#### *Environmentally sustainable design*

- The panel would like to consider the approach to environmentally sustainable design for the proposals in greater detail at a future review.
- While the inclusion of a wall to capture energy within the development is supported, the panel would encourage the project team to adopt ambitious targets for the environmental performance of the buildings, for example the LETI targets.
- The panel questions whether an approach to urban greening has been considered within the site.
- Attention will need to be paid to the mitigation of the noise created by the very busy road immediately adjacent.

#### *Next steps*

- The panel would like to see the proposals again, at a greater level of detail. It will be important to allow enough time to consider each part of Berol Quarter individually, and from different perspectives, including sustainable design, so separate review slots on the same day for Berol House and 2 Berol Yard may be appropriate. It will also be important to have sustainable design panel expertise in each of the reviews, so formal review slots for both buildings may be appropriate.



**Appendix: Haringey Development Management DPD****Policy DM1: Delivering high quality design****Haringey Development Charter**

- A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:
- a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
  - b Make a positive contribution to a place, improving the character and quality of an area;
  - c Confidently address feedback from local consultation;
  - d Demonstrate how the quality of the development will be secured when it is built; and
  - e Are inclusive and incorporate sustainable design and construction principles.

**Design Standards**

## Character of development

- B Development proposals should relate positively to their locality, having regard to:
- a Building heights;
  - b Form, scale & massing prevailing around the site;
  - c Urban grain, and the framework of routes and spaces connecting locally and more widely;
  - d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
  - e Rhythm of any neighbouring or local regular plot and building widths;
  - f Active, lively frontages to the public realm; and
  - g Distinctive local architectural styles, detailing and materials.



**CONFIDENTIAL****London Borough of Haringey Quality Review Panel****Report of Formal Review Meeting: Berol Quarter Phase 4**

Wednesday 19 October 2022

Room 5M1, Clockwise Wood Green, Greenside House, 50 Station Rd, N22 7DE

**Panel**

Peter Studdert (chair)

Tim Pitman

Esther Everett

Louise Goodison

Andy Puncher

**Attendees**

Richard Truscott	London Borough of Haringey
Philip Elliot	London Borough of Haringey
Rob Krzyszowski	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
John McRory	London Borough of Haringey
Emily Read	London Borough of Haringey
Deborah Denner	Frame Projects
Kirsty McMullan	Frame Projects
Joe Brennan	Frame Projects

**Apologies / report copied to**

Elizabetta Tonazzi	London Borough of Haringey
Suzanne Kimman	London Borough of Haringey

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### 1. Project name and site address

Berol Quarter, Ashley Road, London, N17 9LJ  
Hybrid planning permission reference: HGY/2017/2044

### 2. Presenting team

Jonathan Carkeet	Berkley Square Developments
Paul Eaton	Allies and Morrison
Aidan Potter	John McAslan + Partners
Ben Kelway	Lichfields

### 3. Planning authority briefing

Tottenham Hale is an area earmarked by the GLA to deliver 1,965 homes and is a Tall Building Growth Area and a Local Employment Area: Regeneration Area. It is within the site allocation Ashley Road South for the creation of an employment-led mixed-use quarter, creation of a new east-west route linking Down Lane Park and Hale Village, enhanced public realm and residential use. It falls within Flood Zone 2.

The Berol Quarter site sits within the Ashley Road South Masterplan and covers an area of 1.02ha. A hybrid planning permission has been partially built out with residential building 'The Gessner' completed and occupied since 2021. There are a number of relevant emerging nearby tall buildings, such as the approved 38 storey Tottenham Hale Island Site building.

A new full planning application at the Berol Quarter site (phase 4) is now proposed comprising comprehensive refurbishment and extension of Berol House, alongside a new mixed-use building, 2 Berol Yard. This scheme will complete the Ashley Road South masterplan. It will deliver 210 Build to Rent homes and approximately 620 sqm of retail and 160 sqm of community floorspace at 2 Berol Yard, alongside the refurbishment of approximately 3,300sqm of existing commercial floorspace and 2,000sqm new employment space at Berol House, plus associated public realm and landscaping. Allies and Morrison are designing 2 Berol Yard, John McAslan & Partners are designing the refurbishment and extension works at Berol House, and Churchman Thornhill Finch are leading the landscape design and public realm to connect the two buildings.

The panel reviewed the original hybrid scheme for the Ashley Road Masterplan in January 2017 and a joint reserved matters application for the detailed design of Berol House and 'The Gessner' in September 2017. A separate reserved matters application for the detailed design of Berol House was reviewed in November 2019. Most recently, a former iteration of the current proposal was reviewed in August 2022.

Planning officers asked for the panel's comments on 2 Berol Yard and the surrounding public realm, including: height and massing; microclimate impacts on the public realm and surrounding buildings; landscaping; and architectural expression.

**CONFIDENTIAL****4. Quality Review Panel's views***Summary*

The panel's comments at this review focused primarily on the newbuild proposals for 2 Berol Yard. It is broadly supportive of this and feels a case has been made for a tall building on this site, subject to continuing refinement of the architecture, public realm, and a robust strategy to facilitate delivery of the pedestrian bridge across Watermead Way. The rationale for a tall building on this site, marking key public infrastructure nodes, is convincing. This height must be justified by public benefit, provided by substantial public realm improvements that can support a new community of this scale. This should include the bridge over Watermead Way that would facilitate access to the Lea Valley Park. Berol Square will be the heart of the scheme, and the public realm design should be extraordinary, creating an attractive destination. The architecture needs further work to protect residents from the hostile Watermead Way environment, increase legibility from outside to inside, celebrate the entrance experience, and define the activity and character of the shared gardens. The commercial strategy is welcome, and the panel encourages the project team to refine the details of this for each area, as an integral part of the public realm.

The panel supports the proposal for Berol House and urges safeguarding of the quality through to delivery. The materiality and detailing should be refined to ensure that the building has a clear hierarchy and looks convincing at night. The panel questions the permeability of the ground floor plan beyond the central access route and suggests focusing on the activation of spaces around Berol Square.

These comments are expanded below.

**2 Berol Yard***Height and massing*

- Considering the wider emerging context, the panel agrees that a case can be made for height on this site to complete the triangle cluster of tall buildings, marking Tottenham Hale station and the green link. However, justification for height will depend on the public benefit that the scheme can offer and continuing refinement of the massing at a detailed level.
- The panel recommends further testing and adjustment of heights to ensure the different faceted elements of the building relate positively to the emerging context.
- In the panel's view Berol Walk does not feel like a balanced, two-sided street because its western face risks feeling overbearing, compromising the quality of public realm at ground floor level.
- The panel would encourage a significant reduction in height to the element directly facing Berol House and a lesser reduction in height to the element fronting Berol Square, both to improve the street life of the public realm.



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- This will help to create more difference between the tallest element and the shoulder elements of the building lower down. The panel supports the height of the tallest element, on the basis that this forms part of a cluster of tall buildings around the station. It should, however, read as subservient to the tallest building in the centre of the cluster facing the station.
- The ground and mezzanine floor facing Ashley Road step out beyond the building line, and the panel asks that this is reconsidered, to avoid constricting the width of the street.
- The panel welcomes the move to rotate the building, which resolves its' previous concerns about proximity to other buildings.
- The panel agrees with the decision to angle the tallest element towards the River Lea and Lea Valley open space nearby.
- The panel notes that a carefully resolved servicing strategy will be essential to minimise impact on public realm around the building. It would welcome further information on this at a future review.

### *Public benefit*

- In the panel's view, the acceptability of a building of up to 30 storeys will depend in large part on the public benefit it offers. This must come from the delivery of more than high-quality new homes; it must deliver extraordinary and substantial public realm to support a new community of this size and create a new destination.
- Key to this will be a robust strategy for delivery of the bridge over Watermead Way, to increase pedestrian and cycle connectivity. The panel does not think that merely providing a bridge landing as part of the scheme is sufficient and encourages the applicant and the Borough to establish a more robust delivery strategy. Ideally the bridge over Watermead Way should be an integral part of the planning application and secured by a Section 106 agreement to which the Borough, as Highway Authority, would also be a party.
- The panel agrees that the second notional bridge (over the railway lines) could be delivered at a future stage because this is subject to as yet unknown requirements for Crossrail 2. However, the design of the Watermead Way bridge should include a landing point for the future bridge over the railway.
- The project team should also consider where public art might be best placed to help with placemaking and wayfinding. The panel suggests that this could help to reinforce the green link, as well as Berol Square.



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### *Public realm and landscaping*

- In the panel's view the heart of the scheme will be Berol Square, rather than the streets around Berol House as shown in diagrams.
- Most people are likely to arrive from the direction of Tottenham Hale station, taking them through Berol Square first. Berol House may also be less permeable than the drawings suggest, making the surrounding public realm more challenging to activate.
- Further thought is needed to ensure that Berol Square is the civic space demanded by this new piece of city. The landscape design and surrounding uses will be key to the success of the scheme as a whole.
- The panel also suggests that the green link should be more than a series of trees and benches. The design should extend across the new bridge and integrate with public artworks to create a place that people will want to visit.
- The public realm feels urban, and the panel thinks that families with children should be considered more in its design. Whilst there is a park nearby, this scheme should provide social spaces for all.
- The panel advises carrying out studies 'day-in-the-life' studies of future residents and visitors of varying demographics. This will help the project team to understand the user experience, developing the public realm and private amenity spaces such as the rooftop gardens to the next level of detail.
- Across the scheme greater attention should also be given to how the public realm welcomes and caters for cyclists.

### *Architecture*

- This scheme will create a large number of homes next to Watermead Way, a busy and hostile road environment.
- The panel encourages the project team and London Borough of Haringey to work on ways that design can temper the impact of the road over the long-term for a better quality of life for the residents.
- The external envelope of the building, which is expressed as a series of buildings with different materiality, looks promising. The panel would support simple and consistent details, as a basis for the changing material colour/tone.
- The panel encourages the project team to continue this idea inside the building to create legibility. The external material could wrap inside the communal areas, allowing people to 'read' the building volumes internally too.
- The cladding of the exposed core currently feels rather dark and monolithic, and the panel asks for further thought about its materiality and detailing.



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- The panel urges the project team to give careful attention to the design of the north-eastern servicing corner at ground floor level. Accessibility, views, signage, greenery and functionality for cyclists should be considered.

### *Internal layout*

- Approximately 700 people will be using the entrance lobby, which should be designed with appropriate generosity. Currently the entrance route creates a 'bottle neck' between the lobby and the stair/lifts. This route is not instinctive and is likely to become congested at peak hours.
- The entrance should also be more celebratory both outside and in, perhaps making a design feature of the staircase at ground floor level. As part of this process, options to provide a stronger link between the residential entrance and the adjoining retail unit could be explored.
- The residential core has the potential to connect to all the rooftop garden spaces, to allow views at the end of corridors, and to bring natural light into the circulation spaces. This aspiration should be protected as the project team develops the detail of each floor and should be informed by the 'day-in-the-life' studies discussed earlier.
- The panel welcomes the project team's ambitions regarding dual aspect homes and providing a range of external shared spaces.
- The gardens could be designed with defined characters, uses and programmes of activity. This will help the spaces to feel accessible and welcoming, creating a cohesive community.
- The project team's learnings about which rooftop spaces have been well-used in the completed buildings nearby should inform the designs here.

### *Commercial strategy*

- The commercial strategy is well thought through. It is positive to see this being considered at an early stage and the commitments are welcomed.
- The panel encourages the project team to now focus on the next stage of curation, continuing to develop the commercial strategy alongside the design.
- Key focal points should be identified, and the project team should zoom in and refine the individual strategy for each. The retail strategy will be key to the success of the public realm. The green link, Berol House, Berol Square and the Watermead Way bridge should all be focal points for active uses.
- The panel emphasises that a substantial amount of creativity will be required to find the right tenants for the commercial space to support a thriving public realm.



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### Berol House

- The panel thinks that the proposals for Berol House promise a successful re-use of this locally listed building. The materials and detailing of the new elements will be crucial to carry the quality of the design through to delivery.
- The panel suggests the façade designs could emphasise a tripartite hierarchy, with the original Berol House building as the heavier base, the additional full length two storeys as the Piano Nobile levels, and the setback rooftop element as a pediment.
- The terracotta cladding on the exterior of the 'Piano Nobile' could have a more reflective quality than the existing brickwork below. This may help to ensure that the base 'reads' as the primary element, with lighter elements on top.
- The building's appearance at night will be influenced by its materiality, as well as lighting, and merits further exploration.
- The panel understands that as a minimum, a single public route through the ground floor of Berol House will be provided – and that additional routes cannot be guaranteed as part of the commercial strategy.
- For this reason, the panel suggests that the concept of permeability through all sides of the building should not be overplayed, and the project team should focus on Berol Square as the primary civic space that requires activation.

### *Next steps*

The Haringey Quality Review Panel would like to see the proposals for 2 Berol Yard again when the scheme has developed in response to the comments above. This should be a full review to allow time to cover sustainability, public realm strategy, landscape design, bridge delivery/design and architectural expression.

It is confident that the applicant team will be able to address its minor comments on Berol House in liaison with planning officers, but any updates on the design should be provided as context for the next review of 2 Berol Yard.

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**London Borough of Haringey Quality Review Panel**

**Report of Chair's Review Meeting: Berol Quarter**

Wednesday 1 March 2023

Room 0:M1, Clockwise, Greenside House, 50 Station Road, London N22 7DE

**Panel**

Peter Studdert (chair)  
Esther Everett

**Attendees**

Philip Elliot	London Borough of Haringey
Suzanne Kimman	London Borough of Haringey
Robbie McNaugher	London Borough of Haringey
Chris Mussett	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Joe Brennan	Frame Projects
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**CONFIDENTIAL****1. Project name and site address**

Berol Quarter, Ashley Road, London N17 9LJ

Planning application reference: HGY/2023/0261

**2. Presenting team**

Jonathan Carkeet	Berkley Square Developments
Paul Eaton	Allies and Morrison
Paul Hanegraff	Berkley Square Developments
Ben Kelway	Lichfields

**3. Planning authority briefing**

Tottenham Hale is an area earmarked by the GLA to deliver 1,965 homes as a Tall Building Growth Area and a Local Employment Area: Regeneration Area. It is within the site allocation Ashley Road South for the creation of an employment-led mixed-use quarter, a new east-west route linking Down Lane Park and Hale Village, enhanced public realm and residential use.

The Berol Quarter site sits within the Ashley Road South Masterplan and covers an area of 1.02 ha. A hybrid planning permission has been partially built, with residential building The Gessner completed and occupied since 2021. There are several emerging tall buildings nearby, such as the approved 38-storey Tottenham Hale Island Site building.

A new full planning application at the Berol Quarter site (Phase 4) is now proposed comprising comprehensive refurbishment and extension of Berol House, alongside a new mixed-use building, 2 Berol Yard. This scheme will deliver 210 build to rent homes and approximately 620 sqm of retail and 160 sqm of community floorspace at 2 Berol Yard, alongside the refurbishment of approximately 3,300 sqm of existing commercial floorspace and 2,000 sqm new employment space at Berol House, plus associated public realm and landscaping. Allies and Morrison are designing 2 Berol Yard; John McAslan & Partners are designing the refurbishment and extension works at Berol House; and Churchman Thornhill Finch are leading the landscape design and public realm to connect the two buildings.

The panel reviewed the original hybrid scheme for the Ashley Road Masterplan in January 2017 and a joint reserved matters application for the detailed design of Berol House and The Gessner in September 2017. A separate reserved matters application for the detailed design of Berol House was reviewed in November 2019. The panel saw a very early iteration of the scheme in August 2022 and a revised scheme in October 2022. This review considers 2 Berol Yard only. The panel were satisfied with the proposals for Berol House at the previous review.

Planning officers asked for the panel's comments on the delivery of the bridge (in balance with public realm and community space), the quality of residential accommodation, the response to microclimate and the sustainability strategy.



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### 4. Quality Review Panel's views

#### *Summary*

The proposals for Berol Quarter have been through a number of iterations and have now developed into a scheme that the panel warmly supports. Berol House sensitively safeguards the character of the area and animates the public realm. This review focused on 2 Berol Yard, which the panel is now convinced will contribute to a successful new neighbourhood.

The panel's initial concerns about the appropriateness of the tower's scale in this context have been addressed by creating a skilful relationship with the emerging surrounding buildings, and by the quality of residential accommodation. However, the bridge over Watermead Way, not only the landing, should be delivered to justify the height of this proposal in terms of public benefit. The bridge should be formally tied in with this scheme through a Section 106 agreement. The design of the bridge landing is developing well. Input from an accessibility expert should be sought to determine the best arrangement of the lift and stair. A channel for bicycles should be incorporated into the stairs, and two lifts could be provided to take pressure off the lift.

More mature trees with larger canopies should be included in the landscape design and enough space should be allowed for events. The panel enjoys the historical references used in the seating designs. These could also work as play structures. They should be made from robust, high-quality materials, and offer a good opportunity for co-design with local artists and the community. All private and shared rooftop amenity spaces should be analysed to ensure they are usable in windy conditions. The internal layout of the cores is working well. The panel commends the integration of sustainability considerations into the design, especially through solar shading. Overheating should be tested against extreme summer temperatures. The materials palette is promising. The revisions to the residential entrance experience are also positive improvements.

#### *Bridge delivery*

- The panel recognises the complexities involved in delivering the bridge over Watermead Way but does not think that only providing a bridge landing as part of the scheme is a sufficient contribution to the wider public realm.
- The height of the proposed tower must be justified by significant public benefit. The bridge would provide this, going beyond the expected public realm and community space to provide genuine pedestrian and cycle connectivity to the wider context, including access to nearby open green spaces. It is important to adhere to the vision for this neighbourhood and set a strong precedent for other schemes coming forward.
- However, the panel agrees that the second notional bridge (over the railway lines) could be delivered at a future stage yet to be determined, because this is subject to as yet unknown requirements for Crossrail 2.



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- In the panel's view, the delivery of the bridge over Watermead Way should be formally tied in with this scheme as an integral part of the planning application and secured by a Section 106 agreement to which Haringey, as highway authority, would also be a party. This could be in the form of a sum of money for others if delivery is not within the gift of this scheme, but should include clear timescales for delivery.

### *Bridge landing design*

- The panel enjoys the design development of the bridge landing. The crank in the layout knits it into the scheme and helps to define the public realm.
- The lift and stair access points for the bridge landing are separate at ground floor level, and together at first floor level. The panel agrees that the current solution is clearer for wayfinding than the stair wrapping around the lift to keep the entrance points together. There are also other benefits such as a sense of arrival at the top, shelter from the elements while waiting for the lift, and the potential to connect to the building's cycle store.
- However, as it is best practice for the lift to be visible from the stair, the panel recommends seeking input from an accessibility expert on the best arrangement. They could also advise whether it is likely that ramps will be needed to allow easy access if the lift is out of action. Allowing for early integration of these requirements will help to future-proof the scheme.
- The panel suggests investigating whether two lifts will be required to provide resident access to the cycle store.
- The panel also suggests incorporating a channel for bicycles into the stairs to take pressure off the lift. This should be comfortable to use, leaving enough spacing between bike pedals and stair balustrades.

### *Public realm*

- The public realm would benefit from an increase in greenery to meet the vision of a 'green link' to connect the site into wider networks.
- The panel recognises that there may be constraints, such as underground servicing. However, it thinks that if it is not possible to have more trees, the trees could have larger canopies. This would not reduce the capacity for movement or events underneath, and the scale of the trees would be more appropriate to the tall buildings in this scheme.
- The public realm spaces should be tested to ensure they are sufficiently sized for larger installations or events. This need can be balanced with the aspiration for an intimate square rather than a civic space.
- The panel is convinced that the width of Berol Street has been well thought through, alleviating its previous concerns that it will feel too constrained.



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- The panel enjoys the pencil theme coming through in the ideas for the public realm artwork and seating. This helps to bring the Berol pencil factory history through to the future development.
- The panel recommends that the hexagonal seating is made from granite or a similar high-quality material robust enough for outdoor weathering, constant use, and potential scrapes with servicing vehicles. These could 'grow' out of the ground like the Giant's Causeway, creating an exciting playscape for children as well as seating.
- The design of the seating, play structures and artwork are ideal opportunities for public engagement and could be developed with local artists and through co-design with communities. This would strengthen the design narrative, adding a layer of local individuality.

### *Private amenity spaces*

- It is positive to see the wind analysis that has been completed so far. The panel asks that this is carried out for all private balconies and shared rooftop amenity spaces, to demonstrate that they will be usable. Although the balconies are recessed the building is very tall, and some façades will be very exposed to the elements.
- The panel supports the internal layout which gives residents direct access to the amenity spaces and clear views to them from each core. This will assist with internal wayfinding, as well as making the circulation spaces more enjoyable to spend time in.

### *Architecture*

- The panel commends the integration of sustainability considerations into the design, especially through the solar shading 'kit of parts'. The solar gain testing of this looks promising.
- While a good balance must be found with daylight and views, the panel encourages the project team to continue to refine the overheating mitigation strategy considering possible future summer temperatures.
- The panel supports the evolution of the scheme's materials palette. The choice of a glazed terracotta baguette rainscreen should create interest and a sense of depth on some of the larger façades.
- The revisions to the entrance sequence and appearance of the entrance door from Berol Square are positive improvements.

### *Next steps*

- The panel is confident that the applicant team can address its comments in liaison with Haringey officers.



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### Appendix: Haringey Development Management DPD

#### Policy DM1: Delivering high quality design

##### Haringey Development Charter

- A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:
- a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
  - b Make a positive contribution to a place, improving the character and quality of an area;
  - c Confidently address feedback from local consultation;
  - d Demonstrate how the quality of the development will be secured when it is built; and
  - e Are inclusive and incorporate sustainable design and construction principles.

##### Design Standards

###### Character of development

- B Development proposals should relate positively to their locality, having regard to:
- a Building heights;
  - b Form, scale & massing prevailing around the site;
  - c Urban grain, and the framework of routes and spaces connecting locally and more widely;
  - d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
  - e Rhythm of any neighbouring or local regular plot and building widths;
  - f Active, lively frontages to the public realm; and
  - g Distinctive local architectural styles, detailing and materials.



**DM Forum for Berol Quarter 6<sup>th</sup> October 2022 at half 7 PM**

Council Officers:

- Robbie McNaugher - Head of Development Management and Enforcement Planning (RMc)

Applicant team:

- Aidan Potter - John McAslan + Partners (AP)
- Paul Eaton - Allies and Morrison (PE)
- Ben Kelway – Lichfields (BK)
- Jonathan Hoban – Lichfields (JH)
- Malcolm Lea – Berkeley Square Developments (ML)

RMc – Introduced the meeting

- Introduced the purpose of the meeting and the speakers.

ML – Introduced the proposals

- Introduced the scheme and showed the site context and images of the existing permission and the proposed site.
- Noted that BSD have built 20% of homes in TH.
- Explained that BSD want Berol to be a new heart for TH.
- Looking to create new connections and permeability to promote pedestrian flow and activity.
- Looking to create a new square.
- Noted the amount of commercial uses at ground floor in the vicinity.

AP – Talked about Berol House

- 90% of building to be retained albeit with new entrances and openings introduced.
- 2 storey addition
- With 5<sup>th</sup> floor that is set back
- 5<sup>th</sup> elevation – the roof
- Much more activity at ground floor
- Replacement of windows but sympathetically
- 2 storey extension in terracotta cladding with glazed recessed addition above.
- Inherently flexible floorplate
- Opportunities for natural ventilation

PE – Talked about 2 Berol Yard

- Residential and tall building proposed

- The design seeks to relate to the immediate and distant context through form and materials
- Stepped form with 5 blocks around a central core
- Blocks of 5 storeys, 18 storeys, 25, and 30.
- The site/building seeks to mark the green link from the high road to the river lea and vice-versa.
- Would enable a bridge over Watermead Way and the railway to the east – by securing a raised access within the 5 storey building that lines the green link/Ashley link
- The building steps out to attempt to provide strong active retail frontages.
- The enabling works run alongside a community space.
- Inset balconies
- Solar roof as well as green roofs (biodiverse), some with amenity
- 2 fire stairs and 2 sets of separate firefighting access lifts
- Retail animating the west, south and part of the east elevations
- Shaded windows to deal with overheating
- Lowered forms on south/west elevations to minimise heat gain
- Functional hard landscapes that are also loaded with greenery – designed by Churchman Thornhill Finch

ML – summed up the numbers

- Proposed number of homes:

Tenure	Studio	1 Bed	2 Bed	3 Bed	
Private	20	48	76	6	150
DMR			26	16	42
LLR			12	6	18
Totals			114	28	
Total affordable					60
O/a total homes					210

- Proposed number of affordable homes by habitable room:

Tenure	Hab rooms	% overall	% affordable housing
DMR	142	25%	70%
LLR	60	11%	30%
Totals	202	35%	

- BSD retain retail and commercial space in order to curate it. The residential elements are sold on to specialist operators
- They are seeking to create a place that does not currently exist in Tottenham Hale
- Scheme benefits:

## Scheme Benefits

- New active commercial quarter and centre for Tottenham Hale
- New public realm
- New high-quality iconic architecture
- New connections
- Highly sustainable development
- Sensitive renovation of Berol House
- c. 3,300sqm refurbished commercial space at Berol House
- c. 2,200sqm additional commercial floorspace at Berol House
- 210 BfR Homes
- 202 affordable habitable rooms (35%)
- c.£3.9 million in CIL
- Over £1 million towards community improvements in S106 costs
- Contribution towards public art

RMc – Highlighted a question from Cllr Peacock in the chat

- AP sought to explain that the pediment will stay on both elevations provided the one to the rear remains – and could be reinstated.

Question from Jack

- Accessibility of the access to the bridge for wheelchair users and cyclists.
- PE explained that a ramp with an acceptable gradient would be too long and would not be practical given the height they need to clear on the road.

Question from Martin

- Likelihood of bridge being built.
- ML explained that the land for the bridge is outside of their site and control – but the bridge would be enabled alongside a community asset.
- The bridgehead in Hale Village is there but it remains a question mark given the need to include network rail and the cost implications.

## Question from Cllr Gordon

- Supports proposals for Berol House but concerned about the height of the tower proposed for 2 Berol Yard.
  - Local residents will feel hemmed in – So would like to see floors taken off.
  - Dormitory town and overcrowding – number of studios is high.
  - Affordability – the amount of affordable.
  - Mitigation of pollution – liveable wall or green features that help with this.
  - Commitments on rent levels? – would there be affordable workspace?
- 
- PE explained the site is in a tall building growth area and in a pocket of high density next to a major transport node.
  - They have been careful to step the building so that it does not take away light and sky in the same way as a larger block.
  - They will look into greening that will remove particulate matter as well as green walls but will make sure this lasts and can be maintained.
  - ML explained that retail and commercial is needed to attract people (critical mass) so it will be aimed at creative trades and businesses.
  - BK explained 35% meets LP21 targets – with 70% DMR and 30% LLR.
  - 20 studios are acceptable given the district centre location.

## Question from Cllr Peacock

- Concerned about Tottenham people being priced out.
- ML explained the Gessner is fully let and there is a waiting list.
- BK – no detail at this stage on income caps and rent levels, will look to follow the LP21 and Mayor's housing strategy.

## Question about foreign sales

- The block would not be sold – it would be protected as rented accommodation for the long term in link with LP21 policy on BTR.

## Question about cycling

- PE/AP - Will meet cycle standards and will improve connectivity when the bridge is delivered.
- PE explained flats would have space for mobility vehicles in accessible accommodation.
- ML noted that Ashley Road will eventually become one-way (with contraflow cycle route and raised tables for crossing).
- PE noted they would support cycling access improvements around the site where this would be reasonable
- PE noted that parking and charging space is required under the standards for mobility vehicles and will be incorporated into the scheme.

## Question about construction logistics

- ML explained that there is a loading bay on Watermead Way which would be used for just in time deliveries as Ashley Road is restricted.
- At least a couple of years away in starting construction.

## Question about the Berol House proposals

- ML explained that Berol House has permission for relatively large maisonette units. The change to commercial brings flexibility in terms of potentially bringing in a HQ for a local business.
- AP explained how the proposal would be sensitive given the radical changes in the area. The proposals develop the extant permission and re-present and reposition what is an important historic building.

RMc brought the meeting to a close. Explaining that a statutory consultation will take place if a formal application is submitted and notes of the meeting will be appended to any Officer report.

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## Berol Quarter (Berol Yard)

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2023/0261 & HGY/2023/0241

### Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### The proposal

Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.

### The applicant

The applicant is **Berol Quarter Limited**, the agent is **Lichfields**, and the architect is **Allies and Morrison LLP**.

### Strategic issues summary

**Land use principles:** The development of this brownfield site for a high-density, mixed-use development is acceptable in principle

**Affordable housing:** Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant.

**Urban design:** Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential over-development.

**Transport:** Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan.

Other issues on **sustainable development** and **environment** also require resolution prior to the Mayor's decision-making stage.

**Recommendation**

That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 108. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 06 February 2023 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category/categories of the Schedule to the Order 2008:
  - **Category 1A:** "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"
  - **Category 1B:** "Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres" and
  - **Category 1C:** "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London"
3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

## Site description

5. The subject site comprises two plots, being 2 Berol Yard as well as Berol House. It forms an 'L' shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm).



**Figure 1: Site location (as outlined in red)**

6. The site sits within the Ashley Road South Masterplan (ARSM), Tottenham Hale, London. The brownfield site is located within the Lee Valley Opportunity Area. It is partly located within the Tottenham Hale Town Centre. The surrounding area is characterised by mostly redeveloped site comprising new residential buildings, new retail and commercial units at ground floor level along with new landscaped routes.
7. The site is highly accessible with a PTAL of 5-6a (where 1 is least accessible and 6b is most accessible). The nearest section of the Transport for London Road Network (TLRN) is the A503 The Hale, approximately 100 metres to the south-west of the site. Tottenham Hale Underground Station is 180m from the site. It is also within close proximity of Tottenham Hale Bus Station which is served by eight regular bus services.

### Details of this proposal

8. The proposal seeks planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide 210 new Built to Rent (BtR) residential homes as well as Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works. The commercial portion of the development would deliver 6,359sqm.

## Case history

9. The applicant received planning permission at Berol Yard (ref: HGY/2017/2044) on 8 June 2018 for:

*“Application for full planning permission for the demolition of the existing buildings within the Berol Yard site and retention of Berol House. Erection of two buildings between 8 and 14 storeys providing 166 homes, 694 sqm (GEA) of commercial floorspace (Class A1/A3/B1), 7,275 sqm (GEA) of education floorspace (Class D1), car and cycle parking, open space, landscaping and other associated works. Application for outline planning permission (all matters reserved) for the alteration and conversion of ground, first and second floors of Berol House with up to 3,685 sqm (GEA) of commercial floorspace (A1/A3/B1) and the introduction of a two-storey roof level extension introducing up to 18 homes, cycle parking and other associated works.”*

10. The permission has been partially built out with Building 4 and the associated public realm, now known as the Gessner, having been completed and occupied in 2021. The remaining two plots (Berol House and the College building) of the original hybrid planning application have been unable to be progressed
11. There is a Section 73 linked to this application for a minor material amendment to the permitted scheme at Berol Yard (planning permission ref: HGY/2017/2044). This application seeks to delete and amend existing conditions and add a condition to ensure that phases 3, 4, and 5 will be severed from HGY/2017/2044 upon implementation of any new planning permission being granted in respect of these phases.

## Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Local Plan: Strategic Policies DPD (2013 with alterations 2017); Haringey Local Plan: Development Management DPD (2017); Haringey Local Plan: Site Allocations DPD (2017); Tottenham Area Action Plan (2016); Tottenham Hale District Centre Framework (2015); and the London Plan 2021.
13. The following are also relevant material considerations:
- The National Planning Policy Framework (2021) and National Planning Practice Guidance;
  - National Design Guide (2021).
14. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
- Good Growth - London Plan;

- Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;
- Opportunity Area - London Plan;
- Town centre uses - London Plan;
- Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards draft LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
- Retail / Office - London Plan;
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy draft LPG; Optimising Site Capacity: A Design-Led Approach draft LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards draft LPG;
- Fire Safety – London Plan; Fire Safety draft LPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG;
- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;
- Ambient noise - London Plan; the Mayor's Environment Strategy;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG;
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation

to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#). (Link to practice note).

## Land use principles

15. The site is within the Lee Valley Opportunity Area (OA). As identified in London Plan Policy SD1 and Table 2.1, the Lea Valley OA has an indicative capacity for 21,000 new homes and 13,000 jobs.

### Commercial and town centre uses

16. The site is partially located within the Tottenham Hale Town Centre. London Plan Policies SD6, SD7, SD8 and SD9 support mixed use development in town centres. Additionally, London Plan Policies E1 and E2 support new office provision and mixed-use development, with the focus on identified geographic areas and town centres; and states that new offices should take into account the need for a range of suitable workspace, including lower cost and affordable workspace.
17. The Site Allocation 'Ashley Rd South Employment Area' (Ref: TH6) envisages the wider site for an employment-led mixed-use quarter north of Tottenham Hale District Centre, with capacity for 444 homes and 15,300sqm of commercial floorspace
18. It is understood that approximately 6,500sqm of non-residential floorspace has been constructed, or is approved, as part of the other consented schemes within the Allocation.
19. The education floorspace of approximately 7,200sqm would no longer be delivered at this site; as the College is no longer coming forward. However, the proposals would include 6,359sqm of non-residential floorspace across the site, including an uplift of approximately 1,800sqm (3,685sqm existing and 5,492sqm proposed) in Berol House compared to that consented. Ground level non-residential uses would provide welcome activation to the public realm. The increase in non-residential uses in Berol House is welcomed in contributing to the Site Allocation aim for a mixed-use quarter. The proposals would deliver significant qualitative improvement in the commercial space on the site; replacing low grade accommodation with high quality units designed to appeal to a range of prospective end users, which is supported.
20. The applicant stated that much of Berol House is vacant and many other tenants are on short-term leases, understood to include below-market rents. The intention is for some tenants to be rehoused in the new Berol House. Details of the relocation strategy should be included in any application.
21. The non-residential uses have been established through the extant permission and these uses remain strongly supported in principle.

### Housing

22. London Plan Policy H1 sets out the requirements for boroughs to achieve the housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 15,920 homes for Haringey. Additionally, Policy H1 recommends that boroughs optimise the potential for housing delivery on brownfield sites, especially sites with public transport access levels (PTALs) of 3-6 or which are located within 800 metres of a station or town centre; and housing intensification on low-density sites in commercial, leisure and infrastructure uses.
23. The site comprises a significant development opportunity within the Borough and the proposed residential use on this under-utilised site, partly within a town centre and with very good public transport connections, is supported in principle. The uplift in residential use compared to the consented scheme is also welcomed, subject to resolution of matters raised in this report.

### Summary

24. The development of this brownfield opportunity area site for a high-density, mixed-use development is acceptable in principle.

## **Housing**

### Affordable housing

25. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%. Schemes can follow the 'fast track' viability route and are not required to submit viability information nor be subject to a late stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; meet other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor; and demonstrate that they have taken account of the strategic 50% target and have sought grant to increase the level of affordable housing.
26. London Plan Policy H11 and the Mayor's Affordable Housing and Viability SPG recognises the contribution of Build to Rent in addressing housing needs and increasing housing delivery, and establish a set of requirements for this tenure, which would need to be secured in the section 106 agreement for any permission, including:
  - The homes must be held under a covenant for at least 15 years (apart from affordable units, which must be secured in perpetuity);
  - A clawback mechanism must be put in place to ensure that there is no financial incentive to break the covenant;
  - The units must be self-contained and let separately;

- There must be unified ownership and management of the private and affordable elements of the scheme;
  - Longer tenancies (three years or more) must be available to all tenants with break clauses for tenants;
  - Rent and service charge certainty for the tenancy period on a basis made clear before the tenancy agreement is signed including any annual increases, which should be formula-linked;
  - On-site management;
  - Providers must have a complaints procedure in place and be a member of a recognised ombudsman scheme; and
  - Providers must not charge up-front fees of any kind to tenants or prospective tenants outside of deposits and rent-in-advance.
27. London Plan Policy H11 states that where a Build to Rent development meets these criteria, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity. To follow the fast-track viability route, Build to Rent schemes must deliver at least 35% affordable housing, and the Mayor expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent, with the remaining 70% at a range of genuinely affordable rents. Schemes must also meet all the other requirements of Policy H5. Further guidance is provided in the Affordable Housing and Viability SPG.
28. The Haringey Local Plan states that 40% affordable housing is the expectation, with a tenure mix of 60% low-cost rent and 40% intermediate. However, the Tottenham AAP confirms that the housing priority in this area is for intermediate accommodation, due to the existing concentration of social housing in Tottenham. A portfolio approach has been used for the planning permissions across the masterplan area, whereby 35% affordable housing has been achieved with a tenure split of 70% intermediate, 30% affordable rent.
29. In terms of the applicant’s own portfolio of sites in the masterplan area and planning applications, the applicant stated that 37% affordable housing has been achieved, and a breakdown has subsequently been provided. Within this, the previous consent for the wider site secured 14% affordable housing, which was agreed taking account of the financial burden of the proposed College. It is understood that permission secured viability review mechanisms, including a late-stage review, which should have considered the removal of the College from viability considerations.
30. For the proposal site, 35% (by habitable room) affordable housing is proposed (refer to Table 1), which is welcomed, to be delivered at Discount Market Rent (DMR), of which 30% will be provided as London Living Rent (LLR).

Tenure	Studio	1 Bed	2 Bed	3 Bed	Total
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<b>Private</b>	20	96	228	24	368
<b>DMR</b>	0	0	78	64	142
<b>LLR</b>	0	0	36	24	60
<b>Total</b>	20	96	342	112	530

**Table 1: Total Affordable housing provision by habitable room**

<b>Tenure</b>	<b>Habitable rooms</b>	<b>Overall (%)</b>	<b>Affordable Housing (%)</b>
<b>DMR</b>	142	25	70
<b>LLR</b>	60	11	30
<b>Total</b>	202	36	100

**Table 2: Proposed number of affordable homes per habitable room**

31. The proposal would provide an uplift of 54 affordable homes above the extant planning permission (HYG/2017/2044).
32. Overall, 35% affordable housing is proposed as part of a Build to Rent scheme. The affordable housing would be Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track eligible. However, qualification for fast track is subject to the other caveats being met including securing the affordability, and other requirements listed under Policy H11, through the s106. An update will be provided at the Mayor's decision making stage.

## **Urban design**

33. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

## **Development layout**

34. London Plan Policy D3 states that development proposals should provide active frontages and positive relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest. They should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to buildings.

35. The existing footprint of Berol House would largely remain unchanged whilst 2 Berol Yard would form a roughly square shape building to the east. This would allow for the creation of the new public space, Berol Square. The new position of Berol Square (compared to the previous permission) allows for the square to be activated by retail frontages and to become a destination point.
36. At pre-application stage, concern was identified regarding the southern footprint of the building which projects out with a 6 storey element, effectively narrowing the green link. The applicant stated that this is intended to mitigate against road noise from Watermead Way; however, this is not acceptable justification and increased planting for such aims it recommended. The route is considered too narrow and would not give the green link the prominence ascribed to it in the masterplan. Although a colonnade is proposed, the 6 storey element would be perceived as the end of the route, with only a narrow uninviting route continuing to Watermead Way.
37. The two buildings would also share an improved pedestrian street, known as Berol Walk, that would enhance the quality of the Green Link.
38. The layout of the residential building has been appropriately designed to maximise dual aspect thereby improving access to daylight and sunlight.

#### Height, scale, and massing

39. London Plan Policy D9 (Part B) states that tall buildings should only be developed in locations identified as suitable in development plans. Part C of Policy D9 also states that tall buildings must address their visual, functional, environmental, and cumulative impacts. Policy D9 further establishes that boroughs should determine where tall buildings are an appropriate form of development in Development Plans.
40. Tall buildings are defined in the Haringey Local Plan: Strategic Policies DPD as being buildings 10 storeys and over. Taller buildings are defined as those that are two to three storeys higher than the prevailing surrounding building heights.
41. Figure 2.2 in Haringey Council's Development Management DPD (July 2017) identifies the site as within the Tottenham Hale Potential Location Appropriate for Tall Buildings, although appropriate heights are not identified. As such, the proposal for a 30-storey (110.5 metre) residential building complies with the locational aspects of Part B of Policy D9. The 7 storey (20.8m) office building would not constitute a tall building.

#### Appropriateness of the site for tall buildings

42. Part C of Policy D9 also sets out requirements for assessing tall buildings, including addressing their visual, functional, environmental, and cumulative impacts.

#### *Visual impacts*

43. The context of the site has changed considerably in recent years as consented developments have been built out, with further sites under construction. The masterplan, as partly built out, clearly steps down from the Argent Related (38 storeys) and Hale Village (34 storeys) towers, both adjacent to the Station.
44. The applicant proposes a building of up to 30 storeys, made up of 5 massing blocks of 6, 18, 25 and two c.30 storey elements, around a central core. The proposed 30 storey elements would clearly be contrary to the masterplan generally reducing height along Watermead Way. Further refinement to the height of this proposal may be required in order to acceptably address the visual impacts of this building.
45. The site does not sit within any protected view corridor and the proposed buildings would not impede short or long range protected views.

#### *Functional impacts*

46. The functional impacts are generally considered acceptable in relation to the internal and external design, building materials as well as the maintenance and building management arrangements. The entrances and exit routes are well defined and the building constructions should not interfere with aviation routes. Lastly, consideration should be given to transport matters raised in the below transport section.

#### *Environmental impacts*

47. The applicant's technical information on microclimatic and environmental aspects is currently undergoing detailed review by the Council in order to assess the local impacts and identify whether additional mitigation measures are necessary to address these. This should include a full review of the potential daylight and sunlight impacts to neighbouring sites.
48. An update will be provided at the Mayor's decision-making stage.

#### *Cumulative impacts*

49. London Plan Policy D9(C) requires development proposals to address the cumulative visual, functional, and environmental impacts of proposed, consented and planned tall buildings in an area. This assessment will be concluded at Stage 2.

#### *Tall buildings conclusion*

50. The proposal is located within an area that is identified as suitable for tall buildings. Whilst the functional impacts are generally acceptable in strategic planning terms, the matters discussed above with respect to visual, environmental and cumulative impacts need to be addressed. A full assessment of Policy D9(C) will be concluded at Stage 2.

### Public realm and landscaping

51. Policy D8 states that development proposals should encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.
52. The applicant demonstrates consideration of access to public open space across the site, including Berol Square and Berol Walk with associated planting, in accordance with London Plan Policy G4.
53. As discussed above, the provision of the six-storey building would result in the provision of a narrow green link. This would not give the green link the prominence ascribed to it in the masterplan.

### Architectural quality

54. London Plan Policy D3 states that development proposals should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.
55. The architectural design of 2 Berol Yard has proposed a materials palette which complements the surrounding context. The use of brickwork incorporating a range of brick colours is generally supported.
56. The three-storey extension to Berol House is considered to be a sympathetic addition to the existing building, through the use of terracotta tiling to provide a clad facade, with double-glazed windows.

### Fire safety

57. In line with Policy D12 of the London Plan the applicant has submitted a fire safety statement, prepared by a suitably qualified third-party assessor, AESG. This report demonstrates how the development proposal would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. It is noted that the tall residential building would be provided with two staircases. Haringey Council is required to secure the proposed measures within an approved Fire Statement.

### Inclusive access

58. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The applicant has submitted design and access statement which ensured that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and

provides independent access without additional undue effort, separation, or special treatment, and meets the requirements of paragraph 3.5.3 of Policy D5.

59. Haringey Council is required to secure the proposed measures with appropriate conditions.

## **Transport**

### Healthy Streets TA and Active Travel Zone (ATZ) Assessment

60. The applicant has provided a Healthy Streets TA and ATZ assessment as part of the submission document. The ATZ assessment has chosen several key routes from the site to an array of locations. However, it is recommended that amendments to the routes which should be carried out. This includes the inclusion of the nursery to the north of the site and exploring potential alternative routes to Cycleway 1.
61. It is also noted that the ATZ assessment has been carried out as a desk-based assessment. This method is no longer accepted and it is requested that this is carried out on site as per TfL guidance.
62. Whilst the ATZ has highlighted some key improvements to the area, further scrutiny is required once the onsite assessment has been carried out. As part of the assessment, the applicant should consider routes to Cycleway 1 and assess whether it these meet the TfL Cycle Route Criteria and consider how the requirements could be met as a link.
63. Further discussions are required to consider the appropriate walking and cycling improvements that should be secured through legal agreement as necessary.

### Vehicle, Pedestrian and Cyclist Access

64. There are several proposed pedestrian access points to the site from Ashley Road and Watermead Way. The application site will link up with proposed Green Link and it will also provide a new access route through Berol House – referred to as Berol Passage. This should be secured with 24hr access via the appropriate mechanism. Vehicular access is gained from Gessner Lane, which is deemed acceptable, but TfL has concerns over the management of this space which is discuss further below.
65. TfL has concerns over cyclist access points and how the site integrates into the wider cycling network. This will be discussed further in the detailed comments to the London Borough of Haringey.

### Trip generation and impact

66. TfL requests that the applicant should conduct link load analysis of Tottenham Hale Station. The cumulative impact of all small-scale developments may cause major impact to the system. It is request that the applicant should

provide the analysis based on NUMBAT 2019 data, with the scenarios of base, base + development and base + development + consented development.

#### Safeguarding and Infrastructure Protection

67. The applicant should demonstrate that the relevant consultation and safeguards have been put in place to safeguard adjacent London Underground, TfL Buses and rail infrastructure. It should be show that this is being considered during construction and following completion of the development.

#### Car parking

68. The applicant is proposing 7 blue badge parking spaces for 2 Berol Yard, which equates to 6 for the residential element and 1 for the retail element. This is London Plan compliant from the outset. However, the applicant has failed to identify potential future locations, should an additional 7% demand arise. The car parking for this element is located within an undercroft; TfL requests further information on how this is accessed, particularly for the residential space. For Berol House the applicant is proposing 1 blue badge space which is policy complaint.
69. TfL also notes that there are interim parking arrangements as part of the proposal. TfL request further details on this element and in particular the retention of parking spaces. This should be provided via a Parking Design and Management Plan (PDMP) and this should be secured via condition. Furthermore, all future occupants should be exempt from resident and business parking permits, and this should be secured via s106 agreement. Clarification is also sought on the levels of proposed Electric Vehicle Charging Points (EVCP's), which should be provided in accordance with the London Plan minimums.

#### Cycle parking

70. TfL has concerns over the quantum and design of the cycle parking. The quantum on the plans appears to be below London Plan minimum requirements. In addition to this, design does not accord with the London Cycle Design Standards (LDCS). Further detailed will be within the borough comments.

#### Travel planning

71. The applicant has submitted an outline Framework Travel Plan for the site. Given the location of the site to public transport and potential links to the cycling network, it is considered that the targets should be increased to reflect this. The final travel plan should be secured within the s106 agreement in accordance with London Plan policy T4.

#### Servicing

72. The applicant has provided an outline Delivery and Servicing Plan (DSP) which shows all vehicles apart from refuse, servicing the site via two loading bays on Ashley Road and Watermead Way and swept path analysis has been provided.

73. It is noted that the application would result in the creation of a private road, referred to as Gessner Lane. Only refuse vehicles would be able to service the site using the road, however clarification is sought on the management of this space. The final DSP should be secured by planning condition.

### Construction

74. The applicant has provided an Outline Construction Logistics Plan (CLP). The plan should provide construction details including the expected number of trips, vehicle routing, working hours and practices. The applicant should commit to out of peak hours deliveries, particularly given the proximity of the site to Tottenham Hale Station. The applicant should also confirm the nearby bus stop will not be affected and confirm any potential footway closures.
75. The document should be secured by planning condition and TfL and other key London Underground Infrastructure colleagues should be consulted prior to any commencement of works.

## **Sustainable development**

### Energy strategy

76. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2013 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.
77. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:
- Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;
  - Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
  - Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;
  - Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

78. For the domestic element, the development is estimated to achieve a 81% reduction in CO2 emissions compared to 2013 Building Regulations. For the non-domestic element, a 46% reduction is expected.

#### Whole Life-cycle Carbon

79. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
80. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2 and the applicant should review and respond to the accompanying WLC template (to be issued separately).
81. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)<sup>1</sup>.

#### Circular Economy

82. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.
83. The Applicant has submitted a Circular Economy Statement which is welcomed. However, it does not appear that the Applicant has submitted the completed GLA CE template.
84. Without the completed GLA CE template, the submission is missing some of the reporting tables. The Applicant should submit the completed GLA CE template in Excel format in line with the requirements of the GLA guidance.
85. Where the Applicant has replicated several of the reporting tables within the written report, comments have been provided based on the information received to date. Please refer to the attached document for detailed comments.
86. It is noted that some narrative in the written report is guided by the previous guidance version (Draft for Consultation, October 2020). The Applicant should update this narrative to reflect the relevant Circular Economy principles per the adopted (March 2022) guidance and its accompanying template and tables.
87. It is welcomed that the Applicant proposes to retain and refurbish the existing building on the site however there is additional information required across a number of areas.

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<sup>1</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

88. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)<sup>2</sup>.

#### Digital connectivity

89. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

### **Environmental issues**

#### Urban greening

90. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening. This includes the incorporation of biosolar green roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan. The site forms part of a new green link within the Tottenham Hale District Centre Framework and it is positive to see the proposed design puts this into practice.
91. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.35. The Planning Statement sets out that the proposals are an equal mix of residential and commercial, therefore it is considered that this application meets the target set by Policy G5 of the London Plan. This should be treated as a minimum and any improvements to the quality and quantity of urban greening made where possible.
92. The applicant should confirm that there are no existing trees to be removed to facilitate the proposed development. The applicant should also clarify the number of trees proposed.

#### Sustainable drainage and flood risk

##### *Flood Risk Management*

93. The site is located in Flood Zone 2. A Flood Risk Assessment (FRA) has been submitted as required under the National Planning Policy Framework (NPPF). The FRA adequately assesses the risk of flooding from pluvial, sewer and groundwater flooding, which is considered to be low. The FRA provided for the proposed development generally complies with Policy SI12 of the London Plan.
94. A Flood Warning and Evacuation Plan (FWEP) will need to be prepared (secured by condition) including consideration of the identified risk of reservoir flooding.

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

### *Sustainable Drainage*

95. Paragraph 8.4.8 of the drainage strategy proposes to restrict runoff to 5.7 l/s for the 100-year return period; however, paragraph 8.4.9 states the 'required attenuation to restrict the water flow to 17 l/s'; Microdrainage calculations in Appendix D use a restricted rate of 5.9 l/s. The proposed discharge rate needs to be consistent across the report and calculations. The proposed discharge rate should be restricted to the greenfield QBAR rate for all events up to the 100-year + 40% Climate Change. Correspondence with Thames Water confirming there is capacity to support the proposed flows should also be provided.
96. In terms of SuDS, the drainage strategy proposes green roofs, blue roofs and tree pits, which is welcomed. The strategy states that complexity, economic, and space constraints with the Proposed Development layout do not allow for the implementation of a rainwater harvesting system at the site. This is not considered appropriate justification. Every effort should be made to prioritise rainwater harvesting in line with the London Plan hierarchy.
97. The surface water drainage strategy for the proposed development generally complies with Policy SI13 of the London Plan.

### *Water Efficiency*

98. No water efficiency information has been provided for the proposed development. This is not in line with Policy SI5 of the London Plan.

### Air quality

99. An Air Quality Assessment has been prepared by WSP to accompany the planning application. The report has been reviewed and is of sufficient technical quality. However, the construction dust assessment has incorrectly labelled the magnitude of Trackout as 'large' instead of 'medium' based on 10 HDV outward movements and an unpaved road length of 50-100m. Whilst not correct, it is considered a conservative approach and thus acceptable.
100. The development is air quality neutral (London Plan Policy SI 1 (B) (2a). The development is compliant with London Plan policies:
  - The development is partially located within an AQFA, and the assessment results and conclusions imply the constraints and impacts on the AQFA have been considered (London Plan Policy SI 1 (B) (2d)).
101. The following conditions are recommended:
  - On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards (London Plan Policy SI 1 (D)).
  - Measures to control emissions during the construction phase relevant to a medium risk site should be written into an Air Quality and Dust

Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D))

### Biodiversity

102. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.
103. It is recommended the applicant provide quantitative evidence that the proposed development secures a net biodiversity gain in accordance with Policy G6(D). If biodiversity net gain is not achievable on the site, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.
104. The applicant should prepare an Ecological Management Plan (EMP) to support long-term maintenance and habitat creation. The EMP should be secured by planning condition and approved, if the proposed development is granted planning consent.

### **Local planning authority's position**

105. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

### **Legal considerations**

106. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

107. There are no financial considerations at this stage.

## Conclusion

108. London Plan policies on office, residential development, affordable housing, design, transport, sustainable development and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- Land Use Principles: The development of this allocated, brownfield site for a high-density, mixed-use development is acceptable in principle.
- Affordable housing: Overall, the affordable housing offering would comprise 35% Discount Market Rent housing, of which, 30% would be at London Living Rent levels and the remaining 70% at Discount Market Rent. With an appropriate tenure split between DMR and LLR the proposal is generally considered to be Fast Track compliant.
- Urban design: Whilst the site is within a location identified as appropriate for tall buildings, there are some concerns about height, massing, separation distances and width of the green link, which indicates potential over-development.
- Transport: Further information on the strategic transport issues arising from this development will be required to ensure full compliance with the London Plan.
- Sustainable development: Further information on Energy, Whole Life Carbon and Circular Economy is required to ensure full compliance with London Plan requirements.
- Environment: Further information is required on sustainable drainage, air quality and biodiversity.

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For further information, contact GLA Planning Unit (Development Management Team):

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

**Appendix 11: Plans and Documents List**Proposed drawings:

22049\_07\_100 Ground Floor Plan 1:250 A1 P01  
 22049\_07\_100\_M Mezzanine Floor Plan 1:250 A1 P01  
 22049\_07\_101 First Floor Plan 1:250 A1 P01  
 22049\_07\_102 Typical Floor Plan - Level 02-05 1:250 A1 P01  
 22049\_07\_106 Typical Floor Plan - Level 06-16 1:250 A1 P01  
 22049\_07\_117 Typical Floor Plan - Level 17 1:250 A1 P01  
 22049\_07\_118 Typical Floor Plan - Level 18 1:250 A1 P01  
 22049\_07\_119 Typical Floor Plan - Level 19-24 1:250 A1 P01  
 22049\_07\_125 Typical Floor Plan - Level 25-27 1:250 A1 P01  
 22049\_07\_128 Typical Floor Plan - Level 28-29 1:250 A1 P01  
 22049\_07\_130 Typical Roof Plan - Level 30 1:250 A1 P01  
 22049\_07\_131 Typical Roof Plan - Roof 1:250 A1 P01  
 22049\_07\_200 South Elevation - Ashley Link 1:250 A1 P01  
 22049\_07\_201 West Elevation - Berol Walk 1:250 A1 P01  
 22049\_07\_202 North Elevation - Gessner Lane 1:250 A1 P01  
 22049\_07\_203 East Elevation - Watermead Way 1:250 A1 P01  
 22049\_07\_300 Section A-A 1:250 A1 P01  
 22049\_07\_301 Section B-B 1:250 A1 P01  
 22049\_07\_302 Section C-C 1:250 A1 P01  
 22049\_07\_303 Section D-D 1:250 A1 P01  
 22049\_07\_400 Bay Study - Typical Bay Bar B 1:50 A1 P01  
 22049\_07\_401 Bay Study - Gable Bay Bar D 1:50 A1 P01  
 22049\_07\_402 Bay Study - Bar A Gable 1:50 A1 P01  
 22049\_07\_403 Bay Study - Bar E 1:50 A1 P01  
 22049\_07\_404 Bay Study - Bar E 1:50 A1 P01  
 22049\_07\_405 Bay Study - Typical Bay Bar A 1:50 A1 P01  
 2042-JMP-XX-00-DR-A-D1000 Demolition Level 00 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1001 Demolition Level 01 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1002 Demolition Level 02 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1003 Demolition Level 03 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D1004 Demolition Level 04 1:200 A1 01  
 2042-JMP-XX-00-DR-A-D4000 Demolition Elevations 1:200 A1 01  
 2042-JMP-XX-00-DR-A-3000 Proposed Level 00 1:200 A1 01  
 2042-JMP-XX-00-DR-A-3001 Proposed Level 01 1:200 A1 01  
 2042-JMP-XX-00-DR-A-3002 Proposed Level 02 1:200 A1 01  
 2042-JMP-XX-00-DR-A-3003 Proposed Level 03 1:200 A1 01  
 2042-JMP-XX-00-DR-A-3004 Proposed Level 04 1:200 A1 01  
 2042-JMP-XX-00-DR-A-3005 Proposed Level 05 1:200 A1 01  
 2042-JMP-XX-00-DR-A-3006 Proposed Level 06 1:200 A1 01  
 2042-JMP-XX-00-DR-A-4000 Proposed Elevations 1:200 A1 01  
 2042-JMP-XX-00-DR-A-5000 Proposed Sections 1:200 A1 01  
 2042-JMP-XX-XX-SH-A-SH001 Proposed Project Areas 1:200 A1 01

Other documents:

Berol Quarter Design and Access Statement (dated December 2022)  
 WLC Assessment Report (dated 25/05/2023)  
 Detailed Circular Economy Statement (dated 25/05/2023)



# ADDENDUM

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Planning Sub Committee 03 July 2023

**ADDENDUM REPORT**

**UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Agenda Item 8**

<b>Reference No:</b> HGY/2023/0261	<b>Ward:</b> Tottenham Hale
<b>Address:</b> Berol Quarter, Ashley Road, London N17 9LJ	
<b>Proposal:</b> Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.	

**Contents**

- 1. UPDATES AND CORRECTIONS TO THE REPORT**
- 2. CLARIFICATIONS**
- 3. ADDITIONAL CONSULTEE RESPONSES**
- 4. ADDITIONAL CONDITIONS**

**1. UPDATES AND CORRECTIONS TO THE REPORT**

Paragraph numbers in section 2

- 1.1. The paragraph numbers under section '**2. RECOMMENDATION**' should read: 2.1, 2.2, 2.3... etc. to 2.7 as opposed to 1.1 to 1.7 as shown.

Carbon Offsetting excluded from total monitoring fee

- 1.2. On Page 10 of the agenda item under item **20) Carbon Offsetting** in the list of Section 106 Heads of Terms: The carbon offsetting includes a 10% management fee; therefore it shall be excluded from the total under item **21) Monitoring costs**.

Site size

- 1.3. The site is listed under paragraph 3.2.1 as being 2.67 hectares – that figure relates to the entire Ashley Road South Masterplan. The site area is circa 1.2 acres / 0.49 hectares, and this paragraph shall be updated to include the corrected figure.

Berol House locally listed

- 1.4. Paragraph 3.2.9 is updated to include a final sentence "Berol House is a three-storey locally listed building within the site." As this is currently not acknowledged in the Heritage section.

Cycle Parking

- 1.5. Paragraph 6.10.15 is updated to include a final sentence "The proposed cycle parking is considered to be policy compliant".

Fire Safety and Security

- 1.6. The final sentence of paragraph 6.20.3 should be updated to read “The scheme has gone through gateway one and the HSE are content with the proposals and the scheme complies with all current and emerging fire legislation at this stage.”

**2. CLARIFICATIONS**

DEN clarifications

- 2.1. To clarify, the non-residential elements of the development would not be linked between Berol House and 2 Berol Yard. Separate connections have already been installed in Ashley Road for Berol House and 2 Berol Yard. Berol House also has its own dedicated plant room. The DEN condition and s106 obligations seek details of the DEN infrastructure and connection to satisfy policy.

7.0 CIL

- 2.2. For clarification it is noted that the listed CIL amounts are already indexed and would apply if the scheme were implemented today.

Non-residential floorspace figures

- 2.3. For further clarity the summary tables have been included below to show, firstly, Berol House and 2 Berol Yard of existing, proposed, and net changes of the different uses. The second table shows a comparison with what was on site originally (pre-HGY/2017/2044), what was proposed under HGY/2017/2044, and what is proposed now (HGY/2023/0261).

*Table 1 – Berol House and 2 Berol Yard non-residential floorspace*

Non-resi floorspace figures	Existing	Proposed Class E	Proposed F2	Net change
Berol House	3,294	5492		2,198
2 Berol Yard*		706	161	867

*Table 2 – Comparison of non-resi uses pre/post HGY/2017/2044 & proposed*

Non-resi floorspace figures	Prior to permission HGY/2017/2044 (m2)	Proposed in extant HGY/2017/2044 (m2)	Existing position now (m2)**	Proposed Class E (m2)	Proposed mixed class E/F2 (m2)	Net change from pre HGY/2017/2044	Net change from extant permission (m2)
Berol House	4,285	3317	3294	5492	0	1,207	+2,175
2 Berol Yard	1,198	0*	0	706	161	-331	+867
Total	5,483	3317	3294	6198	161	+876	+3,042

\*commercial space only – excludes college (D1 = 7,275sqm GIA)

\*\* accounts for demolition that has taken place on site as a result of HGY/2017/2044

- 2.4. HGY/2017/2044 included The Gessner which falls outside of the site. It also included the college which added 7,275sqm GIA to the non-residential floorspace, albeit this was an educational use and not an employment use. Site

allocation TH6 identified an indicative development capacity of 15,300sqm of commercial floorspace across the ARSM.

- 2.5. Across the ARSM not including the site (Berol House and 2 Berol Yard) approximately 12,176sqm of commercial floorspace has been provided (permitted, under construction, or constructed). When the commercial floorspace within the current proposal is added total increases to 18,535sqm. This would exceed the identified capacity and provide a net increase in employment floorspace over the previous scheme.

Urban Greening Factor

- 2.6. Paragraphs 6.13.1 – 3. This notes that the proposal complies with policy G5 of the London Plan. The Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.
- 2.7. The proposal has more residential floorspace than commercial, however, the majority of the ground floor would be commercial, and the scheme delivers a significant uplift in commercial floorspace across the ground floor and upper floors of Berol House as well as public realm improvements.
- 2.8. The opportunity for greening in the public realm is very limited due to the need for maximum flexibility for the commercial spaces, the community & cultural activities, and for unrestricted movement through the site.
- 2.9. As a result, the majority of the paving in the public areas is designed to be hardstanding, which makes achieving an urban greening factor of 0.4 difficult without impacting on those factors. Furthermore, larger trees would be less suited to the proposed context.
- 2.10. Considering the mix of uses across the site, with Berol House dedicated solely to commercial purposes and 2 Berol Yard a mix of commercial and residential, the proposed urban greening factor of 0.32 – 0.34 would be acceptable.
- 2.11. Condition 19 – Biodiversity requires the applicant to show how additional greening has been maximised and will ensure that the urban greening factor is as high as possible.
- 2.12. Policy G5 allows Boroughs to develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. Given the quantum of commercial proposed, the need for the site to provide activation and permeability/movement, and the nature of the residential element being a tower, the proposed level of Urban Greening is considered to be appropriate and acceptable, and conditions would seek to maximise the level wherever possible.

Social & Community Infrastructure - Employment and skills

- 2.13. Additional wording –
- 2.14. *After Para 6.9.25 - Local Plan Policies SP8 and SP9 aim to support local employment, improve skills and training, and support access to jobs. The Council's Planning Obligations SPD requires all major developments to contribute towards local employment and training.*

- 2.15. *There would be opportunities for borough residents to be trained and employed as part of the construction process and once the proposed development is occupied. The Council requires the developer (and its contractors and sub-contractors) to notify it of job vacancies, to employ a minimum of 20% of the on-site workforce from local residents (including trainees nominated by the Council) during and following construction. These requirements have been agreed with the applicant and secured by legal agreement. As such, the development would have a positive impact on local employment provision.*

Trees

- 2.16. Para 6.14.7 to include- *49 trees are proposed in the scheme, 17 of which would be planted at street level within the public realm.*

Equalities

- 2.17. Paragraph 6.21.7 should state that there would be an overall positive equality impact from the new housing, affordable housing, employment, and arts/culture installations & new space.

**3. ADDITIONAL CONSULTEE RESPONSES**

- 3.1. The **Designing Out Crime Officer - Metropolitan Police Service** made the following comments:

We would ask that our department's interest in this planning application is noted and that we are advised of the final Decision Notice, with attention drawn to any changes within the development and subsequent Condition that has been implemented with crime prevention, security, and community safety in mind.

**Officer note:** A Secured by Design condition has been recommended, which once approved would ensure a safe and secure development and reduce crime.

**4. ADDITIONAL CONDITIONS**

- 4.1. Transport Planning "raised concerns" about Blue Badge parking for the commercial Berol House. To ensure that a careful assessment is carried out and that sufficient Blue Badge parking is delivered for the commercial use the following condition is recommended:

**Berol House Blue Badge Parking**

53, Prior to first occupation of Berol House, an assessment which demonstrates adequate provision for Blue Badge holder parking bays for Berol House shall be submitted to and approved in writing by the Local Planning Authority.

Once approved the development shall be completed in accordance with the approved details and retained as such thereafter unless otherwise agreed in writing.

REASON: To ensure that the development complies with London Plan Policy T6.5 Non-residential disabled persons parking.

**MINUTES OF MEETING Planning Sub Committee HELD ON  
Monday, 3rd July, 2023, 7.00 - 8.48 pm**

**PRESENT:**

**Councillors: Barbara Blake (Chair), Reg Rice (Vice-Chair), Nicola Bartlett, John Bevan, Cathy Brennan, George Dunstall, Scott Emery, Emine Ibrahim, Sue Jameson, Sean O'Donovan and Alexandra Worrell**

**1. FILMING AT MEETINGS**

The Chair referred to the notice of filming at meetings and this information was noted.

**2. PLANNING PROTOCOL**

The Chair referred to the planning protocol and this information was noted.

**3. APOLOGIES**

There were no apologies for absence.

**4. URGENT BUSINESS**

There were no items of urgent business.

**5. DECLARATIONS OF INTEREST**

There were no declarations of interest.

**6. MINUTES**

The Chair advised that all outstanding minutes would be available for approval at the next meeting.

**7. PLANNING APPLICATIONS**

The Chair referred to the note on planning applications and this information was noted.

**8. HGY/2023/0261 - BEROL QUARTER, ASHLEY ROAD, N17 9LJ**

Philip Elliott, Planning Officer, introduced the report for: Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace;

and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.

The following was noted in response to questions from the Committee:

- The extension would form part of the wider strategy for the area, and provide benefits for many residents, such as transport links.
- It was the Applicant's intention to build a college building, however the institution that had agreed to occupy this had pulled out of the contract. There was a significant market exercise to find an alternative, but this had been unsuccessful.
- In terms of affordability, this application was for 'Build to Rent'. There was a specific policy in the London Plan (H11) which set out the policy on tenure mix. This application complied with these policies in the affordability criteria.
- In terms of the bridge and access and the risk of anti-social behaviour, this would be managed and monitored by the applicant.
- There would be a considerable CIL contribution in relation to the NHS that the applicants would be making as part of Build to Rent, and this would be twice as much as the contribution normally expected for residential development for sale.
- The ground floor spaces would be rented out as Class E, commercial, not betting shops, at a peppercorn rate.
- There would be minimal parking in the area (Blue Badge parking will be available) as Tottenham Hale was an accessible area with various transport links.
- Condition 4 required a plan to be submitted to show how wheelchair adaptable homes would be distributed across all tenures.
- Urban greening could be increased, but this would impact public space, the community art space and the general free movement of residents. The applicants had chosen to go with accessibility instead of extensive greening. Condition 19 is a requirement to show the Applicant has done as much as they can to green as much as possible.
- Enhanced single aspect essentially meant at the corner of each dwelling there is a balcony, which was slightly better than solely a single aspect. Due to the nature of the tower it would be difficult to not have single aspects.
- The bridge would have to go through vigorous assessments. The Met Police would be involved in this and would consider the feasibility for the bridge, and ensure design/crime and safety will be considered in the study.
- Preferential treatment normally would be 3 months, this would be a longer period to ensure the people using these units would be Haringey residents. It is certainly the applicant's intention to make sure that there are businesses opening later to corroborate with a daytime and night time economy in the new development. Families will be prioritised.

There were no objections to the proposal. The Chair invited the Applicant Team – insert names – to respond to questions from the Committee. NOTED:

- The refuse collection had been designed on the basis of twice weekly collections, and there would be a concierge service to ensure waste was managed. Work would be undertaken with residents to maximise recycling, which would reduce the size of waste storage. The applicants had agreed with officers to undertake a monitoring review after 12 months but the onus would be on the Applicants to monitor space.
- There would be a Concierge 24 hours a day 7 days a week, so the building would be fully managed at all times. Over the last 5 years the applicant had worked with Haringey employment teams to maximise local employment opportunities. There would be no opportunity for any forms of Air BnB in a build to rent scheme, as this would breach the terms of the lease.
- Paragraph 6.9.10 set out the benchmark for viability. The current CIL charge was based on an indicative S106 contribution of roughly £1000 per unit, and the total contributions secured for this development would be in excess of this.
- Haringey residents would have priority and there would be a marketing period for local Haringey residents and families. There would also be opportunities to sign up to a waiting list. There was also a commitment to developing a joint approach with the Council for the affordable units which would align with the Council's intermediate housing policy.
- The 15 year proposal for lease followed the covenant as part of the Section 106 requirement for Build to Rent. It was hoped that this lease would be renewed in the future.

Robbie McNaugher, Head of Development Management, summed up the recommendation as set out in the report, along with amendments to conditions and Heads of Terms, following the Committee's consideration of the application:

- To include Condition 53 as set out in addendum:  
**"Berol House Blue Badge Parking**

53) Prior to first occupation of Berol House, an assessment which demonstrates adequate provision for Blue Badge holder parking bays for Berol House shall be submitted to and approved in writing by the Local Planning Authority.

Once approved the development shall be completed in accordance with the approved details and retained as such thereafter unless otherwise agreed in writing.

REASON: To ensure that the development complies with London Plan Policy T6.5 Non-residential disabled persons parking.

- Amend Heads of Terms 2(d) to include priority for Haringey residents in the affordable housing
- Amend Heads of Terms 9 to include the consideration of Secure by Design principles in the bridge feasibility study

The Chair moved that the recommendation be granted, with the amendments as outlined, and following a vote with 10 in favour, 0 against and 1 abstention, it was

**RESOLVED**

1. To GRANT planning permission and that following Stage II referral to the GLA, the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability is authorised to issue the planning permission and impose conditions and informatives subject to signing of a section 106 Legal Agreement providing for the obligations set out in the Heads of Terms below.
2. That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to make any alterations, additions, or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.
3. That the section 106 legal agreement referred to in resolution ( 1) above is to be completed no later than 01/09/2023 or within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in their sole discretion allow; and
4. That, following completion of the agreement referred to in resolution ( 1) within the time period provided for in resolution 3) above, planning permission be granted in accordance with the Planning Application subject to the attachment of conditions.

**Conditions** (the full text of recommended conditions is contained in Appendix 2 of the report)

- 1) 3-year time limit
- 2) Approved Plans & Documents
- 3) Phasing Plan
- 4) Accessible Accommodation
- 5) Commercial Units - Opening Hours
- 6) Commercial Units – Class E Only
- 7) Quantum of development
- 8) BREEAM Certificates
- 9) Residential – Noise Attenuation
- 10) Residential – Noise Attenuation from commercial/community
- 11) Fire Statement
- 12) Landscape Details
- 13) Playspace
- 14) Surface Water Drainage

- 15) Surface Water Network (Thames Water)
- 16) Water Network Capacity (Thames Water)
- 17) Flood Warning and Evacuation Plan (FWEP)
- 18) Water Efficiency Condition
- 19) Biodiversity
- 20) Lighting
- 21) External Materials and Details
- 22) Living roofs
- 23) Landscape and ecological management plan (LEMP)
- 24) Energy Strategy
- 25) DEN Connection
- 26) Overheating
- 27) Overheating Building User Guide
- 28) Circular Economy
- 29) Whole Life Carbon
- 30) Secured by Design
- 31) Written Scheme(s) of Investigation for Archaeology
- 32) Land Contamination
- 33) Unexpected Contamination
- 34) Car & Cycle Parking Management Plan
- 35) Cycle Parking
- 36) Delivery and Servicing Management Plan
- 37) Site Waste Management Plan
- 38) Waste Management Plan
- 39) Detailed Construction Logistics Plan (PRE-COMMENCEMENT)
- 40) London Underground Asset Protection (PRE-COMMENCEMENT)
- 41) Public Highway Condition (PRE-COMMENCEMENT)
- 42) Demolition/Construction Environmental Management Plans (PRE-COMMENCEMENT)
- 43) Updated Air Quality Assessment
- 44) Management and Control of Dust
- 45) Combustion and Energy Plant
- 46) Combined Heat and Power (CHP) Facility
- 47) Business and Community Liaison Construction Group
- 48) Telecommunications
- 49) Wind Mitigation
- 50) Noise from building services plant and vents
- 51) Anti-vibration mounts for building services plant / extraction equipment
- 52) Signage and wayfinding
- 53) Berol House Blue Badge Parking

### **Informatives**

- 1) Working with the applicant
- 2) Community Infrastructure Levy
- 3) Hours of Construction Work

- 4) Party Wall Act
- 5) Numbering New Development
- 6) Asbestos Survey prior to demolition
- 7) Dust
- 8) Written Scheme of Investigation – Suitably Qualified Person
- 9) Deemed Approval Precluded
- 10) Maximise Water Efficiency
- 11) Minimum Water Pressure
- 12) Paid Garden Waste Collection Service
- 13) Sprinkler Installation
- 14) Designing out Crime Officer Services
- 15) Land Ownership
- 16) Site Preparation Works
- 17) s106 Agreement
- 18) Revised Fire Statement required with any revised submission
- 19) Building Control
- 20) Building Regulations – Soundproofing
- 21) Thames Water - Sewage Pumping Station

**Section 106 Heads of Terms (HoTs):**

**1) On-site affordable housing (DMR and LLR)**

Affordable Housing Scheme to be submitted for approval prior to commencement of development which shall include the following:

- a. Minimum of 35% by habitable room (202 habitable rooms).
- b. Tenure mix – 30% London Living Rent (LLR) Housing and 70% Discount Market Rent (DMR) Housing.
- c. Proposed Number of Habitable Rooms by tenure: DMR = 78 (2-bed) and 64 (3-bed); LLR = 36 (2-bed) and 24 (3-bed).
- d. Triggers for provision - No occupation of the Market Rent Housing Units until all of the Affordable units have been delivered.
- e. Location of different tenures (a plan of the affordable housing showing where both DMR and LLR is located).
- f. Affordable housing residents to have access to the same communal amenity and play space as Market Rent housing.

**2) Affordability**

- a. Tenure mix – 30% London Living Rent (LLR) Housing and 70% Discount Market Rent (DMR) Housing.
- b. DMR housing = 2 Bedroom: 75% of Market Rent and 3 Bedroom: 65% of Market Rent and a commitment to retaining rents calculated at these levels and using the same methodologies.
- c. Provide a dedicated 6-month marketing priority period for local Haringey Residents for the affordable units which shall be completed 12 to 6 months prior to Practical Completion with evidence of the marketing

provided to the Council. Families shall be prioritised for the DMR family 3-bedroom units.

- d. A commitment to developing an approach to allocations jointly with the Council for both the LLR and DMR units. That process shall ensure allocations and lettings align with the Council's Intermediate Housing Policy with a commitment to prioritise households with children for the two- and three-bed DMR units, and to ringfence two- and three-bed LLR units for households with children.
- e. Evidence of the chosen tenants shall be provided to show compliance.

**3) Viability Review Mechanism**

- a. Early-Stage Review if not implemented within 2 years in whole or in part; and
- b. Development Break review – review if construction is suspended for 2 years or more.

**4) Build to Rent (BtR) Obligations**

- The homes shall be held under a covenant for at least 15 years (apart from affordable units, which shall be secured in perpetuity);
- A clawback mechanism if BTR homes are sold
- Unified ownership and management of the private and affordable elements of the scheme;
- BtR housing shall be provided in accordance with an approved BtR marketing and letting scheme to be submitted for approval 12 to 6 months prior to Practical Completion.
- Not to occupy or cause or permit the occupation of any BtR Housing Unit until a BtR Management Plan has been submitted to and approved by the Council. The BtR Management Plan shall incorporate the following requirements, unless otherwise agreed in writing with the Local Planning Authority:
  - a) Each BtR Housing Unit shall be self-contained and let separately for private Residential Use;
  - b) Rent and service charge certainty shall be provided for the tenancy period on a basis made clear before the tenancy agreement is signed including any annual increases, which should be formula-linked;
  - c) Longer tenancies (three years or more) shall be made available to all tenants;
  - d) Each lease of each BtR Housing Unit shall contain a break clause allowing the tenant to end the lease with a month's notice any time after the first six months of the lease;
  - e) Providers must not charge up-front fees of any kind to tenants or prospective tenants outside of deposits and rent-in-advance.
  - f) The BtR Housing Units shall be managed as a whole by a single professional property manager which:

- i. provides a consistent and quality level of housing management,
  - ii. has regular on-site presence,
  - iii. is part of an accredited ombudsman scheme,
  - iv. is a member of the British Property Federation or RICS;
  - v. complies with the RICS Private Rented Sector Code,
  - vi. has a complaints procedure.
- g) Details of the waste collection strategy for the BtR Housing Units, including a commitment to a period of monitoring (to be agreed but likely 1 year post occupation) and reporting of waste / recycling volumes and making a payment of £100,000.00 to the Council where twice weekly refuse collections are required (to cover the cost of an additional vehicle) subject to monitoring results. Details of the monitoring shall be submitted to the LPA and agreed prior to occupation as part of the s106 obligation.

**5) Additional Affordable Workspace**

In the event that the construction of Berol House has not commenced by the earlier of:

- A) June 2028, or;
- B) Practical Completion of 2 Berol Yard -

Then Retail Unit 2 (221sqm) shall be allocated as “Additional Affordable Workspace” and subject to a discount of 20% of the prevailing market rent until the later of:

- A) 3 years from the date of Practical Completion of 2 Berol Yard; or
- B) The date of Practical Completion of Berol House.

**6) Commercial Strategy**

Prior to the occupation of both buildings, provide an updated Commercial and Retail strategy which identifies how the proposed uses would complement and enhance the commercial offer in Tottenham Hale, considering the wider regeneration.

**7) Employment & Skills**

- Submission of an employment and skills plan
- No less than 20% of the peak construction workforce to be Haringey residents
- Provision of skills-based training to the 20% referenced above
- 5% of the peak workforce to be provided with traineeships
- Provision of a construction apprenticeships at one per £3m development construction cost up to a maximum of 10% of total construction workforce
- Provision of a £1,500 support contribution per apprentice
- Provision of no less than five STEM/career inspirational sessions per construction phase
- Regular liaison with the Council to allow local businesses and suppliers to tender for works

- Other requirements as agreed in discussions with the Council's Employment and Skills Officer
- A commitment to being part of the borough's Construction Programme for construction and occupation.
- Work with the Haringey Employment and Recruitment Partnership - employment and training opportunities to identify and promote construction jobs during the delivery of both Berol House and 2 Berol Yard.
- Designate a named contact to ensure efficient management and supply of local Council residents for employment and training opportunities.
- Participate in the Haringey Construction Partnership.

**8) Public Art**

- Not to occupy or permit the occupation of any BtR Housing Unit until a public art/lighting installation scheme has been submitted to the council, approved, and implemented.
- For a period of 10 years from the date of first occupation of the BtR Housing Units, an external space within the Berol Square, of not less than 5m x 5m shall be provided which shall be available for not less than 3 months of each year for a temporary public art installation, to showcase Tottenham talent

**9) Future proofing bridge connection**

- Not to occupy or permit the occupation of any BtR Housing Unit until the new public access stairway, lift, and bridgehead have been constructed as part of the 2 Berol Yard building.
- To provide a permissive path right of access for members of the public to pass, with and without bicycles to the bridge head.
- To provide a bicycle track within the public access stairway.
- To maintain the public access stairway, public access lift, and landing area at no expenses to the Council, including all lighting, cleaning, and the like.
- Prior to the construction of the future potential bridge (not by the applicant) install glazing to the external façade to provide an additional winter garden space as an extension to the 2 Berol Yard Cultural and Arts Space (Use Class F2 Community / Affordable Workspace).
- Produce a feasibility study for the bridge over Watermead Way and the railway, the study should include design options and costings for the proposal.
- To use best endeavours to work with those constructing the bridge to ensure its delivery by guaranteeing that whenever the bridge can come forward the bridge builder can connect to their landing stairs and lift, which will be freely available for bridge users.

- Input from an accessibility expert shall be sought to determine the best arrangement of the lift and stair and a channel for bicycles should be incorporated into the stairs.

**10) Cultural and Arts Space**

- 161sqm of Cultural and Arts Space (Use Class F2 Community / Class E Affordable Workspace) floorspace to be constructed on the first floor of 2 Berol Yard - plus public gallery and winter garden area until the potential future bridge is opened.
- Not to occupy or permit the occupation of any BtR Housing Unit until the Cultural and Arts space has been constructed to CAT A standard and first refusal of a lease to be offered to the Council.
- Grant a 15-year Lease of the space, for use by Made by Tottenham (or other such nominated body involved with the arts, creative trade, local industry), or alternative occupier agreed in consultation with the Council with a minimum discount of 20% of the prevailing market rent and a rent-free period of 3 years. The Lease shall also include a right to renew for 2 further 5-year periods, subject to agreement by both parties.

**11) Public Realm**

- Public access to footpaths, cycleways, open spaces, and the Cultural and Arts Space, including the potential future bridgehead provided via a Permissive Path right for public, visitors and the like to all routes.
- Submit and implement an Approved Public Access Plan.
- Maintain development estate public realm areas in accordance with the standards of good estate practice.

**12) National Health Service (NHS) Contribution**

Provide a capped contribution of £25,000 prior to Practical Completion of 2 Berol Yard to support local NHS services.

**13) Travel Plans (Commercial and Residential Travel Plans (£3,000 contribution per plan))**

A requirement for detailed travel plans to be submitted for approval prior to occupation and must include:

- Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan) to work in collaboration with the Council for a minimum of five years
- Provision of welcome induction packs containing public transport and cycling/walking information, map, and timetables, to every new occupant.
- A commitment to liaise with Zipcar to understand utilisation of nearby Car Club bays.

**14) Car Club**

A commitment to provide residents with three years car club membership including a £50 annual credit for those who register.

**15) Car Capping**

No future occupiers will be entitled to apply for a residents or business parking permit under the terms of the relevant Traffic Management Order controlling on-street parking in the vicinity of the development. £5,000 for revising the associated Traffic Management Order.

**16) Construction Logistics/Monitoring contribution**

A payment of £20,000.00 to be paid to the Council - payable as £10,000.00 on commencement of each building.

**17) Considerate Constructors Scheme**

A commitment to sign up to the scheme for the entirety of construction works.

**18) Ultrafast broadband**

All rooms of accommodation and commercial spaces must have access to ultrafast broadband connections (above 100MB/s).

**19) Carbon Management & Sustainability - Future connection to District Energy Network (DEN)**

- An amended energy statement is to be provided on first occupation of the development.
- Estimated carbon offset contribution, plus a 10% management fee; carbon offset contribution to be re-calculated at £2,850 per tCO<sub>2</sub> at the Energy Plan and Sustainability stages (See Carbon Offsetting below for more detail).
- Be Seen commitment to uploading energy data
- A covenant to comply with the Council's standard DEN specification for the building DEN and for any components of the area wide DEN installed on site.
- Submission of Energy Plan for approval by LPA
- Sustainability Review

**20) Carbon offsetting**

Provision of a contribution to offset the carbon emissions of the development where not met on site against the zero-carbon target. Estimate of the carbon offset figure is £327,750.00 for the whole development which is to be reviewed once the amended energy statement has been assessed by the Council. A management fee of 10% is also required (estimate: £32,775)

**21) Monitoring costs**

Based on 5% of the financial contribution total, and £500 per non-financial contribution.

**22) Securing Design Quality**

Retain the existing architects for both buildings as Design Guardians to safeguard the design quality.

**23) Berol House Relocation Strategy**

Submission of a relocation strategy to be submitted prior to construction to identify how existing occupants within Berol House would be supported to find new suitable premises.

5. That, in the absence of the agreement referred to in resolution (1) above being completed within the time period provided for in resolution (3) above, the planning permission be refused for the following reasons:
- a) In the absence of a legal agreement securing 1) the provision of on-site affordable housing and 2) viability review mechanisms the proposals would fail to foster a mixed and balanced neighbourhood where people choose to live, and which meet the housing aspirations of Haringey's residents. As such, the proposals would be contrary to London Plan Policies GG1, H4, H5 and H6, Strategic Policy SP2, and DM DPD Policies DM11 and DM13, and Policy TH12.
  - b) In the absence of a legal agreement securing the Build to Rent (BtR) obligations the proposals would fail to meet the requirements of London Plan policy H11 and. as such, the proposals would be contrary to that policy.
  - c) In the absence of a legal agreement securing financial contributions towards infrastructure provision (the Future proofing bridge connection, Cultural & Arts Space, public art, public realm, and other Transport Contributions), the scheme would fail to make a proportionate contribution towards the costs of providing the infrastructure needed to support the comprehensive development of Site Allocation TH6. As such, the proposals are contrary to London Plan Policy S1, Strategic Policies SP16 and SP17, Tottenham Area Action Plan Policies AAP1, AAP11 and TH6 and DM DPD Policy DM48.
  - d) In the absence of legal agreement securing 1) a Travel Plan and financial contributions toward travel plan monitoring, 2) Traffic Management Order (TMO) amendments to change car parking control measures the proposals would have an unacceptable impact on the safe operation of the highway network and give rise to overspill parking impacts and unsustainable modes of travel. As such, the proposal would be contrary to London Plan Policies T5, T1, T2, T3, T4 and T6. Spatial Policy SP7, Tottenham Area Action Plan Policy TH4 and DM DPD Policy DM31.
  - e) In the absence of an Employment and Skills Plan the proposals would fail to ensure that Haringey residents' benefit from growth and regeneration. As such, the proposal would be contrary to London Plan Policy E11 and DM DPD Policy DM40.

- f) In the absence of a legal agreement securing the implementation of an energy strategy, including the prioritisation of a connection to a DEN, and carbon offset payments - the proposals would fail to mitigate the impacts of climate change. As such, the proposal would be unsustainable and contrary to London Plan Policy SI 2 and Strategic Policy SP4, and DM DPD Policies DM 21, DM22 and SA48.
  - g) In the absence of a legal agreement securing the developer's participation in the Considerate Constructor Scheme and the borough's Construction Partnership, the proposals would fail to mitigate the impacts of demolition and construction and impinge the amenity of adjoining occupiers. As such the proposal would be contrary to London Plan Policies D14, Policy SP11 and Policy DM1.
6. In the event that the Planning Application is refused for the reasons set out in resolution (5) above, the Head of Development Management (in consultation with the Chair of Planning sub-committee) is hereby authorised to refuse any further application for planning permission which duplicates the Planning Application provided that:
- (i) There has not been any material change in circumstances in the relevant planning considerations, and
  - (ii) The further application for planning permission is submitted to and approved by the Assistant Director within a period of not more than 12 months from the date of the said refusal, and
  - (iii) The relevant parties shall have previously entered into the agreements contemplated in resolution ( 5) above to secure the obligations specified therein.

## **9. UPDATE ON MAJOR PROPOSALS**

There were no queries on the report. The Chair noted that any queries could be directed to the Head of Development Management.

### **RESOLVED**

To note the report.

## **10. APPLICATIONS DETERMINED UNDER DELEGATED POWERS**

There were no queries on the report. The Chair noted that any queries could be directed to the Head of Development Management.

### **RESOLVED**

To note the report.

## **11. NEW ITEMS OF URGENT BUSINESS**

There were no new items of urgent business.

**12. DATE OF NEXT MEETING**

It was noted that the date of the next meeting was 18 July 2023.

CHAIR: Councillor Barbara Blake

Signed by Chair .....

Date .....

Planning report GLA/2025/0371/S1/01

19 May 2025

## Berol Quarter (Berol Yard)

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2025/0930

### Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### The proposal

Application made under Section 73 of the Town and Country Planning Act 1990 (TCPA 1990) to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted on 3 March 2025. Permission is sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels and alter the level of affordable housing by way of a deed of variation to the original s106 agreement.

### The applicant

The applicant is **Berol Quarter Limited** and the architect is **Allies and Morrison LLP**.

### Strategic issues summary

**Land use principles:** The development of this brownfield site for a high-density, mixed-use development remains acceptable in principle. However, it is considered that the proposed nil affordable housing offer would conflict with London Plan Policies H4 and H5. The absence of any affordable housing materially impacts on overall planning balance of the scheme. This will be considered further at the Stage 2, if the Council resolves to grant permission.

**Affordable housing:** The proposal to reduce the level of affordable housing from 35% to 0% does not demonstrate compliance with London Plan Policies H4 and H6, nor is it a verified viability position. The FVA is currently being robustly scrutinised by GLA Viability Officers.

### Recommendation

That Haringey Council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 21. The Mayor does not need to be consulted again if the borough decides to refuse the application.

## Context

1. On 24 April 2025 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
  - **Category 1A:** *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”*
  - **Category 1B:** *“Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”* and
  - **Category 1C:** *“Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London”.*
3. In this case, Haringey Council need not refer the application back to the Mayor should it resolve to refuse the application, but the comments made in this report should be taken into account in its determination of the application. Should Haringey Council resolve to approve the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk>

## Site description

5. The subject site is located within Tottenham Hale, comprises two plots, being 2 Berol Yard as well as Berol House. It forms an 'L' shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a vacant plot, whilst Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm). The brownfield site is located within the Lee Valley Opportunity Area and it is partly located within the Tottenham Hale Town Centre.



## Strategic planning issues and relevant policies and guidance

9. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Local Plan: Strategic Policies DPD (2013 with alterations 2017); Haringey Local Plan: Development Management DPD (2017); Haringey Local Plan: Site Allocations DPD (2017); Tottenham Area Action Plan (2016); Tottenham Hale District Centre Framework (2015); and the London Plan 2021.
10. The following are also relevant material considerations:
  - The National Planning Policy Framework (2024) and National Planning Practice Guidance;
  - National Design Guide (2021); and
  - Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on housing, affordable housing, design, heritage, and transport which can be found on the GLA's website [here](#).<sup>1</sup>

## Land use principles

11. The principle of the land use (office and residential) has been established through the extant permission and remains accepted. However, in addition to the proposed amendments to conditions on the extant permission, the applicant seeks to reduce the affordable housing offer from 35% to 0%, by way of a formal deed of variation of the original S106 agreement.
12. The current proposal would fail to address London wide and local affordable housing need to the same extent as the approved permission and would conflict with London Plan Policies H4 and H5. The absence of any affordable housing materially impacts on overall planning balance of the scheme. This will be considered further at the Stage 2, if the Council resolves to grant permission.

## Affordable housing

13. The affordable housing to be provided in the extant scheme is secured through a S106 planning obligation and as such, S73 of the TCPA 1990 (as amended) which grants a new permission subject to new or amended planning condition(s), or without compliance with a planning condition, is not considered to be the appropriate basis for assessing a reduction in affordable housing obligations. Nevertheless, on the basis that the application has been validated and referred, the following assessment is made with respect to affordable housing.

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<sup>1</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

14. As noted above, the extant permission was granted for 210 Build to Rent (BTR) homes, which included 35% affordable housing (by habitable room) comprising a tenure split of 30% London Living Rent; 70% Discount Market Rent), which were secured in the Section 106 agreement. The application seeks to reduce the affordable housing provision to 0% and the applicant has prepared a Financial Viability Assessment (FVA) to justify the proposal. The FVA includes an Order of Cost Estimate dated 7 February 2025 which predates the current signing of the S106 and planning permission.
15. GLA officers will robustly scrutinise the FVA to ensure that the maximum level of affordable housing is secured. Advice will be provided in due course and further discussion with the applicant team and the Council will be required prior to consideration at local Planning Committee. The Council is requested to share its viability advice with GLA officers at the earliest opportunity. An update on viability will be provided prior to the Council's committee meeting and affordable housing and viability will be considered further at the Stage 2 referral, if the Council resolves to grant permission.
16. In summary, the proposal to reduce the level of affordable housing to 0% does not demonstrate compliance with London Plan Policies H4 and H6, nor is it a verified viability position.

### **Urban design**

17. The only design related amendment seeks the replacement of glass panels with inward opening doors at roof level of 2 Berol Yard. This raises no strategic concern.

### **Local planning authority's position**

18. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

### **Legal considerations**

19. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a

possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

20. There are no financial considerations at this stage.

## Conclusion

21. London Plan policies on office, residential development, affordable housing, design, transport, sustainable development, and environment relevant to this application. The application does not comply with the London Plan as summarised below:

- Land use principles: The development of this brownfield site for a high-density, mixed-use development remains acceptable in principle. However, it is considered that the proposed nil affordable housing offer would conflict with London Plan Policies H4 and H5. The absence of any affordable housing materially impacts on overall planning balance of the scheme. This will be considered further at the Stage 2, if the Council resolves to grant permission.
- Affordable housing: The proposal to reduce the level of affordable housing from 35% to 0% does not demonstrate compliance with London Plan Policies H4 and H6, nor is it a verified viability position. The FVA is currently being robustly scrutinised by GLA Viability Officers.
- Urban design: No strategic concerns regarding the very minor changes to the design of the scheme.

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For further information, contact GLA Planning Unit (Development Management Team):

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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

# **BEROL QUARTER, N17 9LJ**

## **REVIEW OF APPLICANT'S FINANCIAL VIABILITY ASSESSMENT**

Final Report

### **SUBMITTED ON BEHALF OF CLIENT:**

LB Haringey

June 2025

## QUALITY STANDARDS

Carter Jonas has prepared this Financial Viability Assessment review report in accordance with the Royal Institution of Chartered Surveyors (RICS) Professional Statement 'Financial Viability in Planning: Conduct and Reporting' 1<sup>st</sup> Edition, May 2019.

The authors of the FVA review report are:



**David Price, Associate Partner, MRICS**



**Guy Ingham, Partner, MRICS**

The version of the report is **Final** dated **June 2025**.

The authors, whilst undertaking the review of the FVA have acted:

- With objectivity;
- Impartially;
- Without interference; and
- With reference to all appropriate available sources of information.

### Terms of Engagement

Carter Jonas has been instructed by LB Haringey to undertake a detailed review of the Financial Viability Assessment (FVA) of the subject planning application scheme to determine the most viable position in relation to the level of affordable housing, in accordance with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).

Carter Jonas confirms that it has no Conflicts of Interest in acting for LB Haringey in reviewing the FVA submitted by the Applicant.

In preparing the FVA review report Carter Jonas confirms that no performance related or contingent fees have been agreed.

### Limitations

This report has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of Carter Jonas. We accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

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## 1. EXECUTIVE SUMMARY

Carter Jonas has been appointed by LB Haringey (the Council), to review the Financial Viability Assessment (FVA) prepared by DS2 LLP (DS2) on behalf of the Applicant, Berol Quarter Ltd, in respect of a planning application at The Berol Quarter, N17 9LJ. The following report provides a review of the financial viability assessment in respect of the proposed development.

Planning Permission (HGY/2023/0261) was granted on 3rd March 2025 for the comprehensive refurbishment and extension of Berol House alongside a new residential led mixed use building providing Build to Rent (BtR) accommodation. The description of development is as below:

*“Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace and the redevelopment of 2 Berol Yard to provide new residential homes, Use Class E floorspace and associated landscaping, public realm improvements, car and cycle parking and other associated works.”*

The Applicant has now submitted a S.73 planning application consisting of a series of amendments to the approved scheme and specifically the removal of affordable housing which was included in the approved scheme for 60 affordable housing units. However, the description of development remains the same.

The subject site comprises two plots, being 2 Berol Yard as well as Berol House. It forms an ‘L’ shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm).

The surrounding area is undergoing significant regeneration, transitioning from a former industrial zone into a new mixed-use neighbourhood. The immediate context includes a series of residential-led developments forming part of the Ashley Road South Masterplan (ARSM), many of which are completed or under construction.

In relation to the site Benchmark Land Value, DS2 has adopted an ‘EUV Plus’ approach based on their opinion of the Existing Use Value of Berol House and adjacent vacant land, assumed suitable for open storage. In both cases, we consider the values attributed to these elements to be overstated. By applying our own yield profile assumptions, the overall EUV is reduced to £7,215,000 which we consider to more accurately reflect the nature of the site’s existing use. Applying a reduced 10% landowner’s premium results in a Benchmark Land Value of £7,936,500. Overall, this represents a reduction of £3,034,543.

The FVA concludes that based on a 100% private scheme and DS2’s assumptions, the development produces a significant viability deficit of £23.7m when the negative residual land value of £12.75m is compared against the adopted Benchmark Land Value of £10.97m.

Carter Jonas’ approach has been to critically examine all the assumptions on which the DS2 appraisal is based. Our approach has then been to undertake sensitivity analysis where in our opinion inputs are not in line with current market conditions.

Regarding the proposed scheme, we have reviewed the inputs in the FVA appraisal, and whilst we agree with the majority of the assumptions, we have made several adjustments, including:

- The inclusion of Interim Rent of £1,747,788
- Reduction to the build costs by £1,927,446 from the cost plan
- Reduction in Opex Costs from 25% to 22.5%
- An increase in office rental from £25 to £27.50psf
- Applied a reduced professional fee allowance from 10% to 8%
- Removal of BtR marketing costs

In addition to the above, there are several assumptions which, although adopted for our own modelling, are subject to further validation. These include:

- CIL and S106 costs
- Development programme - more detail should be provided
- Construction cost queries – Berol House costs appear to be based on 6,002m<sup>2</sup> which is the GEA rather than the GIA of 5,491m<sup>2</sup>. Block E at Berol Yard appears to reflect an inefficient design, and further justification should be provided.

A side-by-side summary of the base analysis against the outputs from the Applicant's FVA is detailed in the table below: -

Proposed Development	DS2	Carter Jonas
Total BLV	£10,971,043	£7,936,500
Residual Land value	(£12,747,164)	(£169,556)
(Deficit) / Surplus	(£23,718,207)	(£8,106,056)

The output indicates that although in our opinion the extent of the viability deficit has been overstated, we acknowledge that there are viability challenges indicated by our own viability deficit.

In addition to our base analysis, we have also undertaken a range of sensitivity testing including: -

1. Impacts of positive and negative market movements (5%)
2. Funding yield stepped changes
3. Reduced purchaser costs to 3%

### Overall Conclusions

Although we have made several adjustments in response to both the BLV and proposed scheme inputs, we concur that, based on current costs and values, the proposed development faces viability challenges, as demonstrated by the projected deficit.

Similarly to DS2 we have undertaken various sensitivity analysis, which demonstrates that combining various positive market movements could lead to significant improvements in scheme viability, potentially resulting in a project surplus.

The Applicant is expected to engage with the Council's standard review mechanisms and trigger points. Given the nil affordable provision and potential outcomes associated with positive market trends, this provision is essential to ensuring the Council can secure additional affordable housing throughout the project's lifespan.

## 2. INTRODUCTION

### 2.1. Background

Carter Jonas has been appointed by LB Haringey (the Council), to review the Financial Viability Assessment (FVA) prepared by DS2 LLP (DS2) on behalf of the Applicant, Berol Quarter Ltd, in respect of a planning application at The Berol Quarter, N17 9LJ. The following report provides a review of the financial viability assessment in respect of the proposed development.

Planning Permission (HGY/2023/0261) was granted on 3rd March 2025 for the comprehensive refurbishment and extension of Berol House alongside a new residential led mixed use building providing Build to Rent (BtR) accommodation. The description of development is as below:

*“Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace and the redevelopment of 2 Berol Yard to provide new residential homes, Use Class E floorspace and associated landscaping, public realm improvements, car and cycle parking and other associated works.”*

The Applicant has now submitted a S.73 planning application consisting of a series of amendments to the approved scheme and specifically the removal of affordable housing which was included in the approved scheme for 60 affordable housing units. However, the description of development remains the same.

Specifically, the proposals comprise 603sqm (GIA) of Class E accommodation which is expected to comprise cafes and restaurants at ground floor level and 160.2sqm (GIA) of community space at first floor level. It will comprise 210 homes on floors 1 to 29 and associated amenity space on the podium and at the proposed level 10 roof. The existing Berol House will be retained and enhanced and will comprise 5,491 sqm (GIA) of Class E floorspace.

This report presents a summary of the planning application, the financial viability assessment and Carter Jonas' response to the FVA.

### 2.2. The Site

The subject site comprises two plots, being 2 Berol Yard as well as Berol House. It forms an 'L' shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm).

The site sits within the Ashley Road South Masterplan (ARSM), Tottenham Hale, London. The brownfield site is located within the Lee Valley Opportunity Area. It is partly located within the Tottenham Hale Town Centre. The surrounding area is characterised by mostly redeveloped sites comprising new residential buildings and new retail and commercial units at ground floor level along with new landscaped routes.

The site is highly accessible with a PTAL of 5-6a (where 1 is least accessible and 6b is most accessible). The A503 The Hale is approximately 100 metres to the south-west of the site. Tottenham Hale Underground Station

is 180m from the site. It is also within close proximity of Tottenham Hale Bus Station which is served by eight regular bus services.

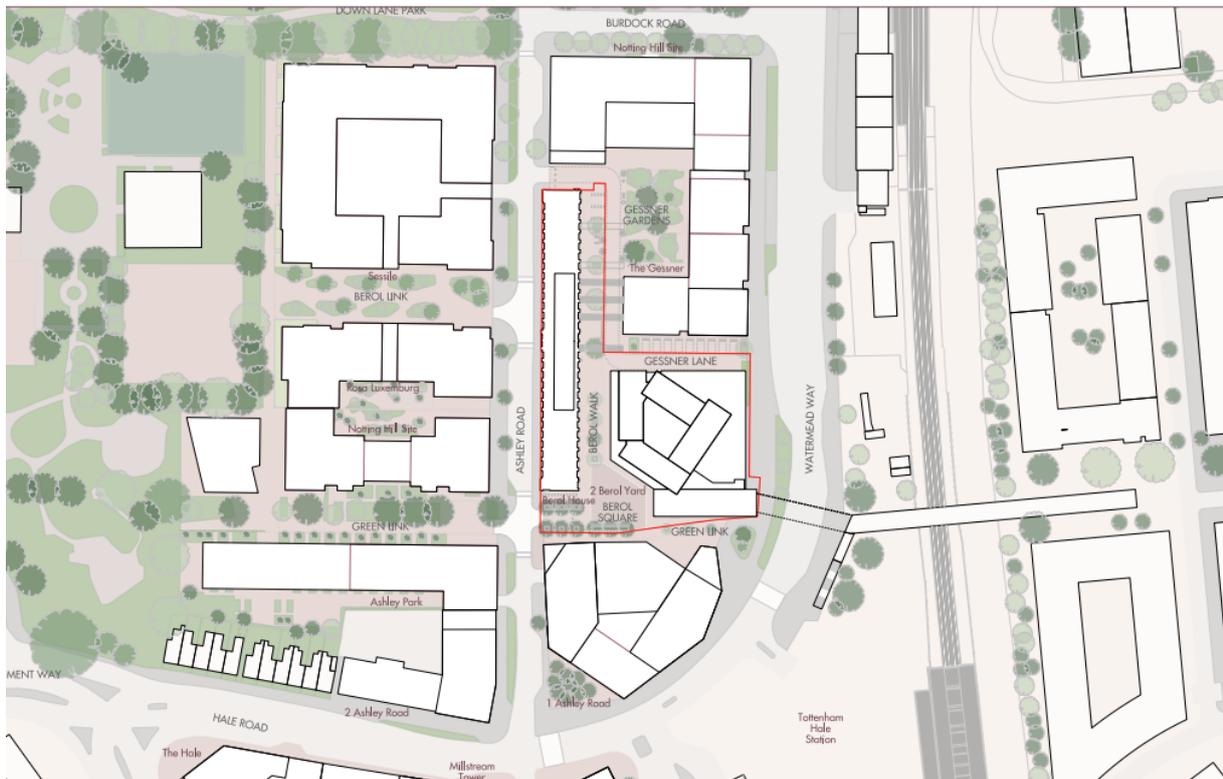
The surrounding area is undergoing significant regeneration, transitioning from a former industrial zone into a new mixed-use neighbourhood. The immediate context includes a series of residential-led developments forming part of the ARSM, many of which are completed or under construction.

Key adjoining developments include:

- The Gessner (1 Berol Yard): A 14-storey residential-led scheme completed in 2021.
- Ashley Gardens: Comprising two buildings of up to 11 storeys delivering 417 homes, with final phases completed in 2023.
- Ashley Park: A Notting Hill Genesis scheme of up to 8 storeys providing 97 homes, approved in 2019.
- Cannon Factory & Ashley House: Granted permission for three buildings of up to 17 storeys, delivering up to 256 homes and 3,600 sqm of commercial space.

To the west across Ashley Road are further development sites including Ashley Gardens, Ashley House, and Ashley Park. To the south lies Tottenham Hale Station, the District Centre, and the Ferry Island development by Argent. The Lee Valley line and Watermead Way border the site to the east, with additional mixed-tenure homes delivered through schemes like Hale Works and Hale Wharf.

For ease of reference a site plan is set out below:



Red Line Boundry - Subject Site

## 2.3. The Planning History

The site has a complex planning history, and this is set out by DS2 in the FVA as detailed below.

The Site is subject to extant planning permission (HGY/2017/2044), which includes 1 Berol Yard, 2 Berol Yard (college site) and Berol House. Planning permission was granted on 8 June 2018 for:

*“Full planning permission for the demolition of the existing buildings within the Berol Yard site and retention of Berol House. Erection of two buildings between 8 and 14 storeys providing 166 homes, 891 sqm (GEA) of commercial floorspace (Class A1/A3/B1/D1), 7,275 sqm (GEA) of education floorspace (Class D1), car and cycle parking, open space, landscaping and other associated works.*

*Outline proposals (all matters reserved) for the alteration/conversion of ground, first and second floors of Berol House with up to 3,685 sqm (GEA) of commercial floorspace (A1/A3/B1/D1) and the introduction of a two storey roof level extension introducing up to 18 homes, cycle parking and other associated works. Amendments to scheme including replacement of accommodation with "build-to-rent" and reconfiguration of internal residential and commercial layout.”*

Reserved Matters for appearance, landscaping, layout, scale and access in relation to Berol House (pursuant to Condition 1 of planning permission HGY/2017/2044) were approved in 2020 (HGY/2020/0080). Since the original planning permission was granted there have also been several non-material amendments (Section 96a) that have been made to the scheme and conditions discharged to enable the development.

The residential component at 1 Berol Yard (now known as the Gessner) and associated public realm has been completed and has been in operation since 2021. The remaining two plots of the original hybrid planning application, the development of which has not commenced, comprised the college site (approved for education floorspace) and Berol House (approved for commercial floorspace and some residential in a roof level extension)

In January 2023, the Applicant submitted a planning application to revise the proposals for the remaining two plots of the original hybrid planning application.

The description of development is: *“Full planning permission for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace; with associated landscaping, public realm improvements, car and cycle parking, and other associated works.”*

We understand this application received planning permission (ref. HGY/2023/0261) in March 2025 and was granted under the fast-track viability route.

Specifically, the proposals included a new mixed-use building at 2 Berol Yard, featuring 603 sqm (GIA) of Class E floorspace at ground floor level, expected to accommodate cafés and restaurants, and 160.2 sqm (GIA) of community space at first floor level. Above, the building will provide 210 Build to Rent homes across floors 1 to 29, with resident amenity space located on the podium and at roof level (Level 10).

The existing Berol House will be retained, refurbished, and extended to deliver 5,491 sqm (GIA) of high-quality Class E commercial floorspace.



CGI – of Proposed Scheme (view of proposed Berol House)

Summary accommodation / unit mix schedules for the proposed development are detailed below:

**2 Berol Yard**

<b>Table One - 2 Berol Yard Residential Accommodation Schedule</b>				
<b>Unit Type</b>	<b>NIA (SQM)</b>	<b>NIA (SQ FT)</b>	<b>Private Rent Units</b>	<b>Unit Mix %</b>
Studio	956	10290	21	10%
1B2P	2481	26705	47	22%
2B3P	1602	17244	24	11%
2B4P	6476	69707	90	43%
3B5P	1679	18072	17	8%
3B6P	1068	11496	11	5%
<b>Total</b>	<b>14262</b>	<b>153514</b>	<b>210</b>	<b>100%</b>

**Table Two - 2 Berol Yard Commercial Accommodation**

a	NIA Sqm	NIA Sq Ft	GIA Sqm	GIA Sq Ft
2 Berol Yard Retail	603	6,487	603	6,487
2 Berol Yard Cultural Space	160	1,724	160	1,724
<b>Total</b>	<b>763</b>	<b>8,212</b>	<b>761</b>	<b>8,191</b>

### Berol House

Table Three - Berol House - Commercial Accommodation		
	NIA Sqm	NIA Sq Ft
Berol House Office	3,717	40,009
Berol House Retail	450	4,844
<b>Total</b>	<b>4,167</b>	<b>44,853</b>

In addition to the above we understand the development is designed to be largely car-free, with a limited provision of car parking spaces to support accessibility needs. A total of seven accessible parking spaces will be provided, comprising six spaces for residential use and one space for retail use. In addition, fifteen Blue Badge spaces will be allocated for residential units at 2 Berol Yard, alongside one Blue Badge space designated for the commercial and retail units within Berol House.

Cycle parking provision has been designed to support active travel and sustainable transport. At 2 Berol Yard, the development will include 376 long-stay and seven short-stay cycle spaces for residential use. At Berol House, provision will include 33 long-stay and 10 short-stay cycle spaces for office users.

As mentioned above, the Applicant has now submitted a S.73 planning application consisting of a series of amendments to the approved scheme and specifically the removal of affordable housing which was included in the approved scheme for 60 affordable housing units. However, the description of development remains the same.

### 3. METHODOLOGY

#### 3.1. Approach

Carter Jonas' review of the Applicant's FVA has had regard to the RICS Guidance Note "Financial Viability in Planning". We do not take issue with the overarching methodology used by the DS2 within their assessment. They have:

- Assessed the realisable value of the proposed scheme;
- Assessed the costs associated with delivering the scheme;
- Assessed a Benchmark Land Value;
- Undertaken an appraisal to calculate the Residual Land Value of the proposed scheme which has been compared to their opinion of the Benchmark Land Value to establish the viability of the scheme.

DS2 has used the Argus Developer software to analyse the viability of the development. The methodology underpinning viability appraisals is the residual method of valuation, commonly used for valuing development opportunities. Firstly, the gross value of the completed development is assessed, and the total cost of the development is deducted from this.

The approach adopted by DS2 has been to adopt a number of assumptions in relation to the proposed scheme to arrive at a residual land value which is then compared to their assumed Benchmark Land Value. In this case, if the residual land value of the proposed scheme is lower than the Benchmark Land Value, then the proposed scheme is deemed to be unviable and is therefore unlikely to come forward for development unless the developer were to take a commercial decision around their level of return or if the planning obligations could be reduced.

The FVA concludes that the scheme, based on a 100% private provision, produces a viability deficit of £23.7m when the negative residual land value of £12.75m is compared against the adopted Benchmark Land Value of £10.97m.

Scheme	Residual Land Value	Benchmark Land Value	Surplus/Deficit
Mixed use – 210 private BTR units 100% Private	-£12,747,164	£10,971,043	-£23,718,207

Given the outputs above, DS2 conclude that the Proposed Development "*is providing in excess of the maximum viable amount of planning obligations and therefore cannot viably support the provision of any affordable housing on a present-day basis, and that the Proposed Development is challenged financially.*"

In addition to the base modelling, DS2 has undertaken sensitivity testing by adjusting values and costs in 5% increments. They have also assessed the impact of varied Build to Rent (BtR) yields by applying positive and negative shifts of 25 basis points.

Given that DS2's calculations are being made in advance of commencement of the development, the figures used in the Applicant's appraisal can only be recognised as a projection. As such, it is essential that all assumptions are carefully scrutinised by the local planning authority to ensure that they reflect current market conditions and have not been unreasonably depressed in respect of the value or overestimated in respect of the development costs.

Carter Jonas' approach has been to critically examine all the assumptions on which the DS2 appraisal is based. Our approach has then been to undertake sensitivity analysis where in our opinion inputs are not in line with current market conditions. We will also scrutinise the Applicant's assessment of Benchmark Land Value which is based on an Existing Use Value approach.

## 4. CRITIQUE OF BENCHMARK LAND VALUE

Determining an appropriate Benchmark Land Value is often the most important factor in determining viability. Put simply, if the value generated by the development does not produce a positive figure, there is no financial incentive to bring forward the development with all its associated risk.

Arriving at an appropriate BLV is not a straightforward exercise and this is acknowledged at 3.4.6 of the RICS Guidance Note which states that:

*The assessment of Site Value in these circumstances is not straightforward, but it will be, by definition, at a level at which a landowner would be willing to sell which is recognised by the NPPF.*

In arriving at an appropriate BLV regard should be had to existing use value, alternative use value, market/transactional evidence (including the property itself if that has recently been subject to a disposal/acquisition), and all material considerations including planning policy. Existing Use Value is widely used in establishing Benchmark Land Value and is supported in the NPPF PPG update from May 2019.

### 4.1.1. Existing Use (EUV +) Approach

Paragraph 13 of the PPG states that a Benchmark Land Value (“BLV”) should be established based on the Existing Use Value of the land, plus a premium for the landowner.

The premium to the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should therefore provide a reasonable incentive, in comparing with other options available, for the landowner to sell the land for development.

Paragraph 14 of the PPG states that BLV should;

- Be based upon EUV;
- Allow for a premium to landowners;
- Reflect the implications of abnormal costs; site-specific infrastructure costs; and professional site fees; and
- Be informed by market evidence including current uses, costs and values wherever possible. Where recent evidence is used to inform assessment of BLV this evidence should be based on developments which are compliant with policies, including for affordable housing. Where this evidence is not available plan makers and applicants should identify and evidence any adjustments to reflect the cost of policy compliance. This is so that historic land values of non-policy compliant developments are not used to inflate values over time.

Paragraph 15 of the PPG defines what is meant by EUV in a viability assessment. This states the following:

*“Existing use value (EUV) is the first component of calculating benchmark land value. EUV is the value of the land in its existing use. Existing use value is not the price paid and should disregard hope value. Existing use values will vary depending on the type of site and development types. EUV can be established in collaboration between plan makers, developers and landowners by assessing the value of the specific site or type of site*

*using published sources of information such as agricultural or industrial land values, or if appropriate capitalised rental levels at an appropriate yield (excluding any hope value for development).”*

The EUV is the first component of calculating BLV. The second component is the premium, or as stated at paragraph 16 of the PPG the ‘plus’ in EUV+.

This is the amount above the EUV required to provide a reasonable incentive for a landowner to bring forward land for development while allowing a sufficient contribution to comply with policy requirements.

The premium should be informed by professional judgement and must be based upon the best available evidence informed by cross sector collaboration. The PPG states that for any viability assessment data sources to inform the establishment of the landowner premium should include market evidence and can include benchmark land values from other viability assessments.

The RICS Guidance Note ‘Assessing viability in planning under the National Planning Policy Framework 2019 for England’, published March 2021, supports the definition of AUV from NPPG and reiterates that any AUV must reflect relevant policy requirements.

When adopting an AUV approach, the premium to the landowner is implicit and therefore an additional landowner premium should not be added as this would be double counting.

NPPG and RICS guidance are clear that if refurbishment or redevelopment is necessary to realise an existing use value then this falls under the AUV provision of NPPG and no landowner premium should be added.

#### **4.1.2. Applicants Approach**

In this case there is a standing asset in the form of Berol House and an existing vacant yard and therefore DS2 has provided their opinion of value using an EUV plus approach.

##### **Berol House**

Berol House is a commercial office building located at 25 Ashley Road, Tottenham Hale, London N17. The property is situated within the Berol Quarter, a regeneration area undergoing redevelopment. It forms part of the former Berol Pencil Factory and is a converted Edwardian structure. The building provides approximately 30,000 sq ft of managed office space over three floors and retains elements of its original industrial design. The premises include open-plan units with access via both street-level entrances and a dedicated rear entrance leading to staff and car parking areas.



The office space at Berol House has been adapted for multi-let use and we understand comprises 15 individual units. These units vary in size, ranging from approximately 650 sq ft to over 5,000 sq ft. Of the 15 units, 11 are currently let and 4 are vacant. The total floor area is 27,900 square feet, with 5,161 square feet currently unoccupied, equating to a vacancy rate of approximately 18.5%.

According to the EUC schedule produced by Micuber Estates Limited (dated January 2025), the current rental income from occupied units is approximately £475,000 gross per annum and £438,399 per annum, net of service charges, insurance, and utilities.

The two highest-paying tenants are NLWA (North London Waste Authority) and Ingeus. NLWA pays £111,000 per annum under a 20-year lease that commenced on 19 May 2014 and expires in May 2034. Ingeus pays a combined rent of £107,302 per annum across multiple units under a 10-year lease that began on 22 October 2021 and expires in October 2031. Together, these two tenants contribute approximately 46% of the total annual rental income.

The tenant mix includes public sector bodies, professional service firms, and small private enterprises. Some leases include utilities and service charges. The four vacant units are located primarily on the first floor and currently generate no rental income. These vacant units represent an opportunity for new lettings but also highlight the current underutilisation of part of the building.

As a converted Edwardian building, Berol House has character features typical of early 20th-century industrial architecture. While this contributes to its distinct identity, the age of the property suggests that ongoing maintenance and modernisation may be necessary, particularly in areas such as mechanical and electrical systems, energy efficiency compliance, and general fabric repair. The building remains functional but may not fully align with modern occupational standards.

In summary, Berol House is a multi-let office property with a significant historical background and a varied tenant profile. It currently provides stable income from long-term tenants but also includes a notable vacancy component. The building's age and former industrial use may require investment to maintain and improve its condition and appeal to potential new tenants.

### **DS2's Approach**

DS2's methodology distinguishes between two components of value i.e the income-producing portion of the property under existing leases ("term") and the expected future income from currently vacant or relettable space ("reversion").

The term value is derived from the existing income stream from let space within Berol House. DS2 assume an average unexpired lease term of 2.9 years and a passing rent of £438,399 per annum, net of service charges, insurance, and utilities. This income is capitalised using a yield of 6.5%, resulting in a value of £5,224,828. This yield reflects DS2's view of prevailing market conditions for short-term, secondary-grade office income in this part of Tottenham Hale.

For the reversionary element, DS2 assume a market rent of £19.50 per sq ft, a capitalisation yield of 6.75%, and incorporate a standard letting delay of six months and a rent-free period of twelve months. These assumptions

yield a reversionary value of £3,194,854. This component of the valuation addresses the future potential income from currently unlet space or that which will become available once current leases expire. The higher yield applied to the reversionary value reflects the additional risk associated with future income compared to secure existing tenancies.

The gross EUV, comprising both term and reversion components, is calculated at £8,419,682. DS2 then deduct purchaser's costs at a standard rate of 6.8%, resulting in a net EUV of £7,847,144. This figure equates to £281 per sq ft. To this EUV, DS2 apply a 20% landowner premium, resulting in a proposed Benchmark Land Value of approximately £9.42 million.

DS2 support their inputs with a set of comparable evidence, primarily comprising rental and capital value data from commercial properties across the wider north London market. The adopted rental value of £19.50psf falls within the broader range of £16 to £22psf observed in these comparables. However, the selected yields of 6.5% and 6.75% appear overly optimistic given the asset's dated condition, non-institutional lease profile, and physical limitations. In our view, a more appropriate yield range, reflecting the building's age, limited specification, and fragmented occupancy, would be 7.0% to 7.5% for the term and reversionary profile.

### **Open Storage**

In addition to the main office building, DS2 has separately assessed the value of a smaller parcel of land within the site that is currently in use as open storage. This area measures approximately 0.13 hectares (14,046 sq ft) and is surfaced with tarmac and fully fenced. It excludes land used for car parking associated with Berol House.

To estimate the rental value of this open storage land, DS2 has reviewed a wide range of comparable open storage sites across London and the wider southeast. The rents observed in this evidence base range from £4.00 to £14.00 per sq ft, with higher rents primarily achieved in well-located sites in Wembley and West London. The majority of comparables, particularly those closer in scale and character to the subject, fall in the mid to lower end of this range.

DS2 ultimately adopt a rental value of £6.50 per sq ft for the Berol Yard storage area, acknowledging its relatively small size but also its proximity to the A10 and North Circular. This rent level yields an annual rental value of £91,299.

To capitalise this rent, DS2 apply a yield of 6.5%. This is supported by market reporting from Carter Jonas, Knight Frank, and CBRE, which indicate prime open storage and distribution yields in the range of 5.25% to 6.50% as of early 2025. DS2 adopt the upper end of this spectrum.

Standard transaction costs are applied, including letting agent and legal fees at 15% and purchaser's costs at 6.80%. After these deductions, DS2 arrive at an EUV of £1,295,392 for the open storage parcel. This equates to a capital value of £4,017,321 per acre.

While the adopted rent of £6.50 per sq ft falls within a reasonable range based on comparable evidence, the justification for the applied yield is limited. The 6.5% yield adopted by DS2 is derived from data on prime and well-established open storage locations, most of which are significantly larger and benefit from superior access, servicing, and operational flexibility. By contrast, the subject site is relatively small, may face operational

restrictions due to its proximity to residential development (such as limited hours of use), and offers only basic surface-level storage space with limited amenity. No improvement works have been accounted for in DS2's valuation.

Moreover, the evidential basis for open storage yields remains relatively opaque, with limited transactional transparency and wide variations depending on scale, tenure, and occupier profile. Applying a 6.5% yield to a small, constrained, and less flexible opportunity we don't believe sufficiently reflects the characteristics and limitations specific to this site. It is our opinion a higher yield in the region of 7.0% would more appropriately account for the Subject site-specific characteristics with no improvement works envisaged.

### **Premium**

PPG guidance states that the premium should reflect the minimum return at which a reasonable landowner would be willing to release land for development. The premium must therefore provide a reasonable incentive when weighed against alternative options while still ensuring that sufficient contributions can be made to meet planning policy requirements. The second point is important in the context of subject site.

While DS2's adopted 20% premium is within the general range observed in practice, it is not evidently based on site-specific viability testing or tied to the anticipated planning obligations of the proposed scheme. The existing building is 82% let and generating income, however, it is an aging structure that may require ongoing investment. Moreover, the subject site is located in a borough with a clear expectation for affordable housing delivery.

In cases where a site is income-producing but encumbered by short lease terms, physical obsolescence, or modest rental potential, a lower premium is more typically applied. This is especially true where full policy compliance is unlikely or the scheme is not expected to generate a significant development surplus. Given the likely viability constraints associated with this scheme, a more conservative premium, such as 10%, we believe is more appropriate. This would reflect an incentive for the landowner while aligning with the core viability objective of enabling sustainable development in accordance with local policy priorities.

### **Overall BLV Summary**

Applying our own yield profile assumptions reduces the overall EUV to £7,215,000. Applying a reduced 10% landowner's premium results in a site BLV of £7,936,500, which we believe more reasonably reflects the nature of the site's existing use. In overall terms this represents a reduction of £3,034,543.

## 5. ASSESSMENT OF APPLICATION SCHEME INPUTS

This section of the report presents the Applicant's appraisal inputs together with Carter Jonas's interrogation of these inputs and appropriate adjustments where applicable.

### 5.1. Scheme Values

The Proposed Development will provide 210 residential units extending to 153,514 sq ft NIA. The proposed unit and tenure mix split is set out in the tables below.

The Proposed Unit Mix

Berol Yard Residential Accommodation Schedule				
Unit Type	NIA (SQM)	NIA (SQ FT)	Private Rent Units	Unit Mix %
Studio	956	10290	21	10%
1B2P	2481	26705	47	22%
2B3P	1602	17244	24	11%
2B4P	6476	69707	90	43%
3B5P	1679	18072	17	8%
3B6P	1068	11496	11	5%
<b>Total</b>	<b>14262</b>	<b>153514</b>	<b>210</b>	<b>100%</b>

#### 5.1.1. Private Rental Values

DS2 has been provided the following average assumed rents per unit type based on advice from Knight Frank which has been incorporated within their review:

Unit Type	Number of Units	£pcm	£pcw	Rent PA (per unit)	Total Rent PA	£psf	Sq. Ft.	Sq. M.
Studio	21	2000	462	£ 24,000	£ 504,000	49	490	46
1B2P	47	2400	554	£ 28,800	£ 1,353,600	51	568	53
2B3P	24	2600	600	£ 31,200	£ 748,800	43	719	67
2B4P	90	2800	646	£ 33,600	£ 3,024,000	43	775	72
3B5P	17	3300	762	£ 39,600	£ 673,200	37	1063	99
3B6P	11	3500	808	£ 42,000	£ 462,000	40	1045	97
	<b>210</b>	<b>£2,685</b>	<b>£620</b>	<b>£ 199,200</b>	<b>£ 6,765,600</b>	<b>£44</b>	<b>731</b>	<b>68</b>

The applied rents result in a total annual income of £6,765,600, equating to £44 per sq ft based on a Net Internal Area (NIA) of 153,514 sq ft for the BtR units. The rent per sq ft ranges from £51 for the 1B2P units to £37 for the 3B5P units.

As mentioned above, DS2 has relied on evidence from a BtR market report produced by Knight Frank on behalf of the Applicant, as detailed in Section 8 of the FVA. In this case, there are a number of comparables referenced in the FVA, which in our view form a reasonable basis for establishing both the rental and capital value tone for the proposed Berol Quarter scheme.

A summary of these comparables is provided below, and we broadly agree with the conclusions drawn.

From the evidence table, the reported asking rents range from £41psf to £47psf, with the majority clustering between £45–£47psf, suggesting a fairly consistent range at the upper end of the local market. Notably:

- The Sessile (£47psf) and The Gessner (£45psf) are both located in very close proximity to the subject site and represent strong indicators of achievable rental tone. Their high spec and adjacency reinforce their relevance.
- One Ashley Road (£41.5psf), while slightly lower, is similarly positioned nearby and provides an additional local benchmark.
- Blackhorse Mills (£47psf) and Equipment Works (£45psf) are situated near Blackhorse Road Station.
- Windlass Apartments (£41psf), while slightly discounted, is noted to be further from the station and situated closer to the River Lea, factors which likely explain the reduced value.

Taken together, these comparables support a prevailing market tone in the £44–£47psf range for well-located, modern BtR accommodation, with downward adjustments justified only where access, specification or adjacency are weaker.

In our opinion, the evidence provided is representative of current market conditions in the area and provides a reasonable basis on which to benchmark the proposed scheme's rental assumptions.

After reviewing the evidence provided and conducting our own pricing analysis in the context of the scale, mix, and characteristics of the subject site, we do not take issue with the rents adopted for the BtR private units.

### **5.1.2. Affordable Rent Units**

#### **Haringey's Local Plan (March 2013, with consolidated alterations 2017)**

LBH's affordable housing policy is contained within their Strategic Policy SP2 which states that sites capable of delivering 10 units or more will be required to meet 40% affordable housing on a habitable room basis, subject to viability. The affordable housing tenure split target is 60% low-cost rent and 40% intermediate. However, under Policy AAP3 of the Tottenham Area Action Plan, the council includes an exception to this split for sites within Tottenham. In Tottenham the split should instead be 60% intermediate and 40% affordable rented.

The policy states that the preferred affordable housing mix in terms of unit size and type of dwellings will be agreed individually for each scheme, driven by an up-to-date assessment of local housing need.

LBH do not have specific policy in regard to BtR and we therefore refer to GLA London Plan policy H11.

#### **The London Plan (March 2021)**

The London Plan was adopted in March 2021. The regional plan sets out the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents. This sets a ten-year housing target of 15,920 new homes for LBH, or 1,592 homes per annum. Policy H4 sets a strategic target of 50% of all new homes delivered across London to be

affordable and sets out specific measures to achieve this aim. The homes should be delivered as genuinely affordable housing. Footnote 53 states that the NPPF defines affordable housing for planning purposes.

Policy H11 recognises that the BtR development model differs from a traditional for sale scheme and the potential role it can play in accelerating housing delivery. Where a development meets the Policy H11 criteria, the affordable housing offer can be solely DMR at a genuinely affordable rent, preferably London Living Rent (LLR) levels. DMR should be secured in perpetuity.

Intermediate rented products such as LLR and DMR should be affordable to household incomes of up to £67,000. Intermediate ownership products such as London Shared Ownership should be affordable to households on incomes of up to £90,000.

Policy H11 Part C provides a Fast Track Route for BtR schemes and states that in order to follow the Fast Track route schemes must deliver at least 35% affordable housing, or 50% where the development is on public sector land or industrial land appropriate for residential units.

Although the previous scheme was assessed via the Fast Track Route, the proposed removal of all affordable housing and shift to a 100% private scheme means DS2 has not modelled a scenario including any affordable provision.

### 5.1.3. Operating Costs

DS2 has applied a 25% deduction to account for fund management costs, voids, bad debt, letting fees, ongoing maintenance, and the provision of residents' facilities. This equates to an operating cost of £8,054 per unit per annum, based on the gross annual rent for the market rental units.

Whilst DS2 references Grainger PLC's full-year results (December 2024), which report an OPEX of 28.9% for their stabilised portfolio, no other specific supporting evidence has been provided to justify the 25% allowance applied here.

We consider it prudent to assess operating expenditure not only as a percentage of income but also on a per-unit basis. In this instance, the implied cost of over £8,000 per unit appears high. We would typically expect operating costs in the range of £5,500–£7,000 per unit.

- The Waitrose, Bromley South (353 units) BTR scheme reflected an OPEX of £5,830 per unit.
- The Waitrose, West Ealing (428 units) scheme reflected an OPEX of £5,680 per unit.
- A 228-unit mixed-use BTR scheme on Sedgemere Road, Abbey Wood (SE2) was agreed at a 22.5% operating cost.
- The Broad Street Mall development, where DS2 also acted as viability advisor, applied the same 22.5%.

In the absence of more detailed justification, we have adopted an OPEX allowance of 22.5% for the purpose of our modelling, which equates an operating cost of £7,248.86 per unit per annum.

#### 5.1.4. BtR Investment Yield

DS2 has capitalised the net rent at 4.15%, referencing the Stabilised Residential Investment Yield Sheets from CBRE (Feb 2025) and Knight Frank (March 2025). While no specific comparable transactions have been cited, we have reviewed the latest yield guidance, including the May 2025 updates, which remain consistent with the Knight Frank position previously referenced.

We do not object to the yield adopted by DS2. In our view, it is broadly reflective of current market expectations, taking into account prevailing conditions and the delivery structure proposed for the scheme.

However, we have also undertaken sensitivity analysis, illustrating the impact on viability of a 15-basis point yield compression to account for potential market movement.

#### 5.1.4. Purchaser Costs

DS2 has applied purchaser's costs of 6.80% to the BtR units. This is an area that has been the subject of considerable debate recently among viability consultants, as agents acting for landowners and applicants have adopted varying positions.

In several FVAs, it has been assumed that Special Purpose Vehicles (SPVs) are established to facilitate the transaction of BtR assets (as well as PBSA and Co-Living schemes), enabling significant Stamp Duty Land Tax (SDLT) savings by transacting the company rather than the underlying asset.

As a result, some agents acting for developers have applied purchaser costs as low as 1.8%, while others have adopted a mid-point between 1.8% and 6.8%, reflecting the variability in deal structures and tax positions.

For the purposes of our modelling, we have replicated DS2's assumption of 6.8% but have also tested a reduced purchaser cost of 3% to reflect the potential for SDLT savings in this context. We do not consider this to be inappropriate given the viability pressures on the scheme and the absence of affordable housing provision.

#### 5.1.7. BTR Viability Summary

Applying DS2's assumptions, namely OPEX at 25%, a net stabilised yield of 4.15%, and purchaser's costs at 6.80%, results in a value of £122,269,880 for the BtR units. Using our own assumptions in relation to OPEX this would produce a value of £126,345,542.

#### 5.1.5. Interim Rent

DS2 has adopted a stabilised income approach in their modelling, capitalising the BtR income at the expiry of a four-month letting-up period using a 'stabilised' yield. However, it appears they have not accounted for the interim income prior to disposal. For modelling purposes, we have included the four-month interim income as proposed, which equates to £1,747,788.

### 5.1.6. Commercial / Non- Residential Values

The following gross development values have been adopted for the non-residential floorspace. The table below also provides a breakdown of the proportion of total GDV attributed to each use.

Use	Value	% of GDV
BtR	£ 122,269,880	85%
Retail	£ 4,538,451	3%
Office	£ 15,723,270	11%
Cultural	£ 482,502	0%
<b>Total</b>	<b>£ 143,014,103</b>	<b>100%</b>

We consider each of the uses in turn below.

#### Retail (Use Class E)

Fletcher King recommended an estimated rental value of £30 per sq ft for the retail space, based on comparable lettings in new-build mixed-use schemes in the local area. The supporting evidence in the report includes:

- Tesco letting at Forest Road at £28.58psf, new build shell and core
- A short-term letting at 2 Berol Link at £30.00psf
- A mix of other lettings in the £20–£33psf range

No formal evidence on incentives is detailed in the Fletcher King summary, but the DS2 FVA references this as shell and core space.

DS2 has adopted Fletcher King's £30psf rental recommendation and applied a yield of 7.00%, having reviewed Knight Frank and CBRE guidance. This yield reflects a position between prime and secondary retail benchmarks, adopted to a mixed-use, non-high street location.

#### Office (Use Class E)

DS2 has followed the Fletcher King advice and adopted £25psf across the 40,009 sq ft of office space, which has been capitalised at a 6.00% yield, supported by yield data for regional cities in Knight Frank and CBRE publications.

While the Fletcher King opinion of rental value adopts a headline rent of £25psf, we consider there is a reasonable case to support a higher rental assumption of £27.50psf based on a review of comparable evidence and scheme-specific considerations.

The comparables referenced by Fletcher King are predominantly converted spaces in older buildings, with limited amenities and located in less strategic or peripheral micro-locations. For instance:

- Stamford Works (N16) shows rents in the range of £25.23 to £29.16psf across various floorplates (570–1,189 sq ft), albeit within buildings with weaker specifications and converted interiors.

- Parkhaus, Downs Road (E5) achieved £29.82psf for a 570 sq ft converted unit, suggesting strong demand for smaller, modernised units even in secondary locations.
- Andre Street (E8) and Bonsoir House (N16) secured rents of £21.29 and £20.15psf, but again in non-purpose-built space with evident specification limitations.

By contrast, the office accommodation at Berol House and 2 Berol Yard offers clear advantages:

- New-build or comprehensively refurbished to Cat A spec and high-quality internal finishes.
- Located within a comprehensive mixed-use scheme, which benefits from enhanced placemaking, footfall, and long-term appeal.
- Strong connectivity via Tottenham Hale station, with Victoria Line and National Rail access within 250m.
- Proximity to emerging residential clusters and occupier demand from creative and flexible workspace operators.

### Cultural Use

In respect of the cultural space, very limited detail has been provided. In respect of the value assumptions DS2 has assumed a rental of £24 per sq ft, which equates to circa 80% of the retail (class E) rental tone. In the absence of any direct comparable evidence, we do not believe this high-level approach to be unreasonable. In addition to the value assumptions, DS2 has reflected a three-year rent-free period, as specified within the S106 agreement, rather than derived from market practice and we have mirrored this approach for our own modelling purposes.

#### 5.1.7. Non-Residential Viability Summary

Whilst we accept the assumptions adopted by DS2 in respect of the retail and cultural uses, we consider the rental value applied to the office space to be overly conservative. Accordingly, we have increased the office rental tone from £25 psf to £27.50psf to reflect the specification and positioning of the proposed space.

The resulting difference in the non-residential GDV is summarised in the table below.

Non Residential Use	DS2 Value	Carter Jonas Value
Retail	£ 4,538,451	£ 4,538,451
Office	£ 15,723,270	£ 17,299,489
Cultural	£ 482,502	£ 482,502
<b>Total</b>	<b>£ 20,744,223</b>	<b>£ 22,320,442</b>

## 5.2. Scheme Costs

### 5.2.1. Build Costs

DS2 has relied on build cost advice provided by the Applicant's cost consultant, Calfordseaden and the cost summary was appended to the FVA with an electronic version provided on request.

According to Calfordseaden, the total construction costs (on a present-day basis, excluding inflation and contingency) are:

- £74,608,800 for Berol Yard
- £16,978,668 for Berol House

Carter Jonas has sub-instructed quantity surveyors Johnson Associates (JA) to review this on behalf of the Council.

#### **Berol Yard:**

JA has advised that costs of £71,007,274 are reasonable, reflecting a variance of -£1,224,263 compared to the cost plan provided by Calfordseaden. In addition to this reduction, JA has noted that Block E appears to reflect an inefficient design, and further justification should be provided.

#### **Berol House:**

JA has advised that costs of £15,778,960 are reasonable, reflecting a variance of -£703,183 against the Applicant cost plan. JA has also highlighted that the cost per m<sup>2</sup> appears to be based on an area of 6,002m<sup>2</sup> which is the GEA rather than the GIA of 5,491m<sup>2</sup> and this should be queried with the Applicant / their cost consultant.

The full cost review is appended to this report. For clarity, we have adopted the costs as estimated by JA within our modelling.

### **5.2.2. Contingency**

DS2 has adopted a 5% contingency in the Argus appraisals and we concur this is in line with what is typically assumed for the purposes of viability assessments.

### **5.2.3. Professional Fees**

Professional fees have been included at 10% of build costs by DS2. Professional fee allowances typically range from 8% to 10% of build costs depending on the complexity of the proposals. The assumed allowance equates to £9,158,747 based on the DS2 assumptions.

On a scheme of this scale and characteristics, and in the absence of a detailed breakdown, we have adopted a reduced 8% professional fee allowance, which equates to a capital sum of £6.94m in our own modelling.

### **5.2.4. Fees and Marketing Costs**

DS2 has adopted the following allowances in respect of the letting and disposal of the residential and commercial accommodation:

- Commercial marketing cost – £1.50 per sq ft (of commercial NIA)
- BtR Marketing – 1% of GDV

- Letting Agent Fee – 10% (of 1st year's annual rental income)
- Letting Legal Fee – 5% (of 1st year's annual rental income)
- Sales Agent Fee (BtR) – 0.5% (of BtR NDV)
- Sales Agent Fee (commercial) – 1% (of commercial NDV)
- Sales Legal Fee (BtR) – 0.25% (of BtR NDV)
- Sales Legal Fee (commercial) – 0.5% (of commercial NDV)

We do not take issue with the assumptions adopted by DS2 with the exception of the BtR marketing fee, which totals £1,222,699.

Specifically, DS2 has applied a 1% marketing cost on the BtR gross development value (GDV) as part of their disposal cost assumptions. While elements such as letting fees and legal costs are standard inclusions in viability assessments, the addition of a standalone BtR marketing allowance based on GDV is not typically adopted within viability modelling.

In practice this cost is typically reflected as a revenue expense incurred during the operational phase of a BtR scheme. As such, it is typically embedded within the operational expenditure assumptions (OPEX) that account for leasing, management, and initial tenant onboarding activities.

This is the approach adopted by DS2 and other viability consultants in recent FVAs and no compelling information has been provided to justify adopting a different approach on this occasion.

### **5.2.5. Finance Cost**

An 'all-in' finance rate of 7.0%, which includes set up and exit fees, has been adopted by DS2, which we do not take issue with in the 'context of the stabilised income approach being taken. This represents an overall finance cost of £12,536,707.

### **5.2.6. S106 & CIL Costs**

DS2 has adopted a CIL figure of £1,772,914 for MCIL and £2,702,822 for LBH CIL, based on advice from the Applicant's planning consultant, Lichfields. These amounts have been included within the Proposed Development appraisal. Whilst we have not been provided with the detailed CIL calculations, we would recommend that the Local Planning Authority reviews and verifies these figures. For the purposes of our own modelling, we have adopted the same CIL assumptions.

In relation to S106 contributions, DS2 has confirmed that the figures have been provided by the Applicant. We understand these are based on the obligations agreed under the Extant Permission, updated for indexation and to reflect the current scheme proposals. The total S106 cost adopted is £2.65 million, as broken down in the table below. Additionally, DS2 has included a further £250,000 allowance within the appraisal for S106, though as with the CIL amount, we recommend this is subject to review and confirmation by the Council's S106 officer.

S106 Item	Value
DEN Connection costs	£ 1,900,000
Waste Recycling Contribution	£ 100,000
Bridgehead Feasibility Study	£ 25,000
Public Art Allowance	£ 100,000
NHS Contribution	£ 25,000
Energy Plan Review	£ 5,000
Construction Logistics Monitoring	£ 20,000
Apprenticeship Support Contribution	£ 53,500
Car Club	£ 31,500
TMO	£ 5,000
Travel Plans (Residential/Commercial)	£ 6,000
Carbon Levy	£ 327,750
Monitoring Fee	£ 50,000
<b>Total</b>	<b>£ 2,648,750</b>

### 5.2.7. Developer's Profit Margin

The appropriate level of developer profit will vary depending on the specific nature of the scheme and is influenced by a range of factors including market conditions, the risk profile, and the scale and complexity of the development. Profit assumptions are typically informed by market benchmarks, comparable schemes, and experience of delivery in similar contexts.

DS2 has adopted a profit margin of 12.5% of GDV for the Build to Rent (BtR) element and 15% of GDV for the commercial components. This equates to an overall profit of £18,395,368 based on DS2's opinion of the sites GDV.

The profit assumptions are consistent with those applied in other BtR schemes across London, which share similar characteristics and therefore reflect market expectations. We do not take issue with the profit levels adopted in this case and we have adopted the same for the purpose of our own modelling.

### 5.2.8. Programme / Cashflow Assumptions

A twelve-month pre-construction period is considered appropriate, reflecting the scale of the scheme and the time required to prepare and mobilise the Site for development. A construction programme of 40 months has been adopted for Berol Yard and 18 months for Berol House which DS2 state is based on advice received by the Applicant.

For the purposes of this assessment, BtR income has been capitalised following a four-month letting-up period, which assumes a letting rate of approximately 60 units per month.

In relation to the commercial uses and having regard to current market conditions and the location of the Proposed Development, the appraisal assumes a 12-month rent-free period and a six-month average letting void. The commercial element is assumed to capitalise upon expiry of this void period.

We have adopted the same development programme for our initial modelling, but we request that a more detailed breakdown of the Berol Yard construction timeline is provided.

### 5.3. Summary Table

The table below provides a summary of the above analysis highlighting any areas of difference, which will form the basis of our sensitivity testing and conclusions in the following section.

Assumption	DS2 Assumptions	Carter Jonas Assumptions (Where Different)	Comments
<b>Revenue</b>			
BtR Revenue	Total Rent - £6,765,600 pa (£44psf) 25% deduction Interim Rent - £N/A	Total Rent - £6,765,600 pa (£44psf) 22.5% deduction Interim Rent - £1.75m	We agree with the rental assumptions but have reduced the OPEX costs from 25% to 22.5% and reflected 4 months of Interim Rent
APR Revenue	N/A	-	100% Private only Modelled
BtR Investment Yield	4.15%	Agreed	-
Non-Residential Floorspace	<p><b>Retail</b> £30psf / 7% yield 12 months RF / 6 month void</p> <p><b>Office</b> £25psf 6% yield 12 months RF / 6 month void</p> <p><b>Cultural</b> £24 psf / 7% yield 3 year RF</p>	<p>Agreed</p> <p><b>Office</b> £27.50psf 6% yield 12 months RF / 6 month void</p> <p>Agreed</p>	We believe the office rent for the new accommodation to be overly conservative in the context of the proposed specification and refurb costs
<b>Development Costs</b>			
Construction Costs (reflecting savings)	£74,608,800 for Berol Yard £16,978,668 for Berol House	£71,007,274 For Berol Yard £15,778,960 For Berol House	See JA cost plan review JA review has identified a potential cost saving of £1,927,446
Contingency	5%	Agreed	

Purchaser Costs BTR	6.8%	See comments	In several FVAs, it has been assumed that Special Purpose Vehicles (SPVs) are established to facilitate the transaction of BtR assets, enabling significant Stamp Duty Land Tax (SDLT) savings by transacting the company rather than the underlying asset.  We have mirrored DS2's assumption and also modelled a reduced purchaser costs allowance of 3%.
Professional Fees	10% £9,158,747	8% £6,942,899	On a scheme of this scale and characteristics and in the absence of a detailed breakdown we have adopted a reduced 8% professional fee allowance, which equates to a capital sum of £6,942,899 in our own modelling.
Sale & Legal Fees	Commercial marketing cost – £1.50 per sq ft (of commercial NIA) BtR Marketing – 1% of GDV Letting Agent Fee – 10% (of 1st year's annual rental income) Letting Legal Fee – 5% (of 1st year's annual rental income) Sales Agent Fee (BtR) – 0.5% (of BtR NDV) Sales Agent Fee (commercial) – 1% (of commercial NDV) Sales Legal Fee (BtR) – 0.25% (of BtR NDV) Sales Legal Fee (commercial) – 0.5% (of commercial NDV)	Commercial marketing cost – £1.50 per sq ft (of commercial NIA) BtR Marketing – Not Agreed Letting Agent Fee – 10% (of 1st year's annual rental income) Letting Legal Fee – 5% (of 1st year's annual rental income) Sales Agent Fee (BtR) – 0.5% (of BtR NDV) Sales Agent Fee (commercial) – 1% (of commercial NDV) Sales Legal Fee (BtR) – 0.25% (of BtR NDV) Sales Legal Fee (commercial) – 0.5% (of commercial NDV)	We have removed the BTR marketing costs. In practice this cost is typically reflected as a revenue expense incurred during the operational phase of a BtR scheme. As such, it is typically embedded within the operational expenditure assumptions (OPEX) that account for leasing, management, and initial tenant onboarding activities.
CIL / S106	£1,772,914 for MCIL £2,702,822 for LBH CIL £2,648,750 S106	Included (Subject to validation)	We have not been provided with any workings and would advise the local planning authority to check and verify the figure adopted in respect of the CIL and s106 amount.

Interest / Finance Costs	7.0%	Agreed	
Developer's Profit	BtR – 12.5% on GDV Commercial – 15% on GDV	Agreed	
Project Timescales	See Table under 5.2.8	Agreed (see comments)	Further detailed breakdown of the proposed development program should be provided.
<b>Summary</b>			
BLV	£10,971,043	£7,936,500	See comments in Section 4
Premium	20%	10%	See Section 4.1.3

## 6. ANALYSIS AND CONCLUSIONS

Where our own market research has indicated that the inputs used have not been fully justified we have sought to illustrate the potential impact on viability. In this respect we have undertaken sensitivity analysis producing residual appraisals using Argus Developer, which is a leading industry-standard development appraisal package commonly used by developers and agents to assess development viability.

Although these analyses do not constitute formal valuations under the provisions of the RICS Valuation Standards ('Red Book') it does provide robust evidence to inform the Council's decision-making process in respect of the Applicant's planning permission.

In this instance we have been provided with the working appraisal in Argus Developer upon which we have undertaken our own sensitivity analysis.

In relation to the site Benchmark Land Value, DS2 has adopted an 'EUV Plus' approach based on their opinion of the Existing Use Value of Berol House and adjacent vacant land, assumed suitable for open storage. In both cases, we consider the values attributed to these elements to be overstated. By applying our own yield profile assumptions, the overall EUV is reduced to £7,215,000 which we consider to more accurately reflect the nature of the site's existing use. Applying a reduced 10% landowner's premium results in a Benchmark Land Value of £7,936,500. Overall, this represents a reduction of £3,034,543.

Regarding the proposed scheme, we have reviewed the inputs in the FVA appraisal, and while we agree with the majority of the assumptions, we have made several adjustments, including:

- The inclusion of Interim Rent of £1,747,788
- Reduction to the build costs by £1,927,446 from the cost plan
- Reduction in Opex Costs from 25% to 22.5%
- An increase in office rental from £25 to £27.50psf
- Applied a reduced professional fee allowance from 10% to 8%
- Removal of BtR marketing costs

In addition to the above, there are several assumptions which, although adopted for our own modelling, are subject to further validation. These include:

- CIL and S106 costs
- Development programme - more detail should be provided
- Construction cost queries – Berol House costs appear to be based on 6,002m<sup>2</sup> which is the GEA rather than the GIA of 5,491m<sup>2</sup>. Block E at Berol Yard appears to reflect an inefficient design, and further justification should be provided.

A side-by-side summary of the base analysis against the outputs from the Applicant's FVA is detailed in the table below: -

Proposed Development	DS2	Carter Jonas
Total BLV	£10,971,043	£7,936,500
Residual Land value	-£12,747,164	-£169,556
Deficit / Surplus	-£23,718,207	-£8,106,056

The output indicates that although in our opinion the extent of the viability deficit has been overstated, we acknowledge that there are viability challenges indicated by our own viability deficit.

### 6.1.1. Sensitivity Analysis

In addition to our base analysis, we have also undertaken a range of sensitivity testing including: -

1. Impacts of positive and negative market movements (5%)
2. Funding yield stepped changes
3. Reduction in purchaser costs to 3%

#### Sensitivity 1 – impacts of positive and negative market movements (5%)

Sensitivity Analysis 1 illustrates the impact of both positive and negative market movements on build costs and rental value. It demonstrates that even minor adjustments to the base inputs can significantly affect the appraisal outputs and the viability of the proposals. The results of this analysis are provided in the table below.

		Rent: MRV / Unit				
Construction: Rate /ft <sup>2</sup>	-10.000%	-5.000%	0.000%	5.000%	10.000%	
-10.000%	1,567,638	-3,309,180	-8,080,901	-12,852,623	-17,624,344	
-5.000%	5,983,210	868,597	-3,961,356	-8,733,078	-13,504,799	
0.000%	10,429,653	5,284,168	169,556	-4,613,533	-9,385,254	
5.000%	14,943,497	9,718,715	4,585,127	-493,988	-5,265,709	
10.000%	19,497,361	14,220,779	9,010,956	3,886,086	-1,146,164	

#### Sensitivity 2 – Funding Yield Compression

Due to current institutional funding climate, we have also undertaken further sensitivity testing to illustrate the effect of potential funding yield movement on the financial viability of the Proposed Development. It is not unrealistic to assume that the funding market may improve as inflation drops and the Bank of England proceeds to reduce interest rates, with a concurrent impact on the cost of capital. We have tested a 15 basis point positive movement from the agreed base funding yield of 4.15% and the results are presented on a residual basis in the table below.

Movement bps	Yield	RLV	Project Deficit / Surplus
- 30 bps	3.85%	£5,605,059	-£2,615,374
- 15 bps	4.00%	£2,615,374	-£5,321,126
Base	4.15%	-£169,556	-£8,106,056

### Sensitivity 3 – Reduced purchaser costs to 3%

Proposed Development	DS2 FVA	Carter Jonas
Total BLV	£10,971,043	£7,936,500
Residual Land value	-£12,747,164	£3,128,370
Deficit / Surplus	-£23,718,207	-£4,808,130

### 6.1.2. Overall Conclusions

Although we have made several adjustments in response to both the BLV and proposed scheme inputs, we concur that, based on current costs and values, the proposed development faces viability challenges, as demonstrated by the projected deficit.

Similarly to DS2 we have undertaken various sensitivity analysis, which demonstrates that combining various positive market movements could lead to significant improvements in scheme viability, potentially resulting in a project surplus.

The Applicant is expected to engage with the Council's standard review mechanisms and trigger points. Given the nil affordable provision and potential outcomes associated with positive market trends, this provision is essential to ensuring the Council can secure additional affordable housing throughout the project's lifespan.

## APPENDIX 1 – APPRAISAL PRINT-OUT

Berol Quarter  
FVA Appraisal CJ

Development Appraisal  
Carter Jonas LLP  
19 June 2025

**APPRAISAL SUMMARY****CARTER JONAS LLP**

**Berol Quarter  
FVA Appraisal CJ**

**Appraisal Summary for Merged Phases 1 2**

Currency in £

**REVENUE**

<b>Sales Valuation</b>	<b>Units</b>	<b>Unit Price</b>	<b>Gross Sales</b>
Interim Rent	1	1,747,788	1,747,788

**Rental Area Summary**

	<b>Units</b>	<b>ft<sup>2</sup></b>	<b>Rent Rate ft<sup>2</sup></b>	<b>Initial MRV/Unit</b>	<b>Net Rent at Sale</b>
2 Berol Yard BtR	210			32,217	5,243,340
2 Berol Yard Retail	1	6,487	30.00	194,610	194,610
2 Berol Yard Cultural Space	1	1,724	24.00	41,376	41,376
Berol House Retail	1	4,844	30.00	145,320	145,320
2Berol House Offices	<u>1</u>	<u>40,009</u>	27.50	1,100,248	<u>1,100,248</u>
<b>Totals</b>	<b>214</b>	<b>53,064</b>			<b>6,724,894</b>

**Investment Valuation****2 Berol Yard BtR**

Current Rent	5,243,340	YP @	4.1500%	24.0964	126,345,542
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**2 Berol Yard Retail**

Market Rent	194,610	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	2,598,264

**2 Berol Yard Cultural Space**

Market Rent	41,376	YP @	7.0000%	14.2857	
(3yrs Rent Free)		PV 3yrs @	7.0000%	0.8163	482,502

**Berol House Retail**

Market Rent	145,320	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	1,940,187

**2Berol House Offices**

Market Rent	1,100,248	YP @	6.0000%	16.6667	
(1yr Rent Free)		PV 1yr @	6.0000%	0.9434	17,299,489

**Total Investment Valuation****148,665,984****GROSS DEVELOPMENT VALUE****150,413,772**

Purchaser's Costs

(10,109,287)

Effective Purchaser's Costs Rate

6.80%

(10,109,287)

**NET DEVELOPMENT VALUE****140,304,486****NET REALISATION****140,304,486**

**APPRAISAL SUMMARY****CARTER JONAS LLP****Berol Quarter  
FVA Appraisal CJ  
OUTLAY****ACQUISITION COSTS**

Residualised Price (Negative land)		(169,556)	
			(169,556)

**CONSTRUCTION COSTS**

<b>Construction</b>	<b>ft<sup>2</sup></b>	<b>Build Rate ft<sup>2</sup></b>	<b>Cost</b>	
2 Berol Yard Construction Costs	267,836	265.11	71,007,274	
Berol House Construction Costs	<u>59,105</u>	266.96	<u>15,778,960</u>	
<b>Totals</b>	<b>326,941 ft<sup>2</sup></b>		<b>86,786,234</b>	<b>86,786,234</b>

Contingency		5.00%	4,339,312	
MCIL			1,772,914	
LBH CIL			2,702,822	
Monitoring Fee			50,000	
Carbon Levy			327,750	
Travel Plans (Resi/Commercial)			6,000	
TMO			5,000	
Car Club			31,500	
Apprenticeship Support Contribution			53,500	
Construction Logistics Monitoring			20,000	
Energy Plan Review			5,000	
NHS Contribution			25,000	
Public Art Allowance			100,000	
Bridgehead Feasibility Study			25,000	
Waste Recycling Contribution			100,000	
DEN Connection costs			1,900,000	
				11,463,798

**PROFESSIONAL FEES**

Professional Fees		8.00%	6,942,899	
				6,942,899

**MARKETING & LETTING**

Commercial Marketing	8,211 ft <sup>2</sup>	1.50	12,317	
Commercial Marketing	44,853 ft <sup>2</sup>	1.50	67,280	
Letting Agent Fee		10.00%	148,155	
Letting Legal Fee		5.00%	74,078	
				301,829

**DISPOSAL FEES**

BtR Sales Agent Fee		0.50%	588,770	
Commercial Sales Agent Fee		1.00%	208,027	
Commercial Sales Legal Fee		0.50%	104,013	
BtR Sales Legal Fee		0.25%	294,385	
				1,195,195

**Additional Costs**

Profit on GDV - Commercial		15.00%	462,115	
Profit on GDV - BtR		12.50%	15,793,193	
Profit on GDV - Commercial		15.00%	2,885,951	
				19,141,259

**APPRAISAL SUMMARY****CARTER JONAS LLP****Berol Quarter****FVA Appraisal CJ****FINANCE**

Debit Rate 7.000%, Credit Rate 0.000% (Nominal)

Total Finance Cost

14,642,828

**TOTAL COSTS****140,304,486****PROFIT****0****Performance Measures**

Profit on Cost%

0.00%

Profit on GDV%

0.00%

IRR% (without Interest)

6.94%

**APPRAISAL SUMMARY**

**CARTER JONAS LLP**

**Berol Quarter  
FVA Appraisal CJ**

<b>Initial MRV</b>	<b>Net MRV at Sale</b>
6,765,600	5,243,340
194,610	194,610
41,376	41,376
145,320	145,320
<u>1,100,248</u>	<u>1,100,248</u>
<b>8,247,154</b>	<b>6,724,894</b>

**APPRAISAL SUMMARY**

**CARTER JONAS LLP**

Berol Quarter  
FVA Appraisal CJ

**APPRAISAL SUMMARY**

**CARTER JONAS LLP**

Berol Quarter  
FVA Appraisal CJ

## **APPENDIX 2 – COST PLAN REVIEW**

ELEMENT	Unit	Rate	Block A - Residential				Block B - Residential				Block C - Residential				Block D - Residential				Block E - Residential				Commercial - Shell & Core				Circulation, Plant, Refuse etc.				
			Qty	E	E/m2 (of GIFA)	E/unit	Qty	E	E/m2 (of GIFA)	E/unit	Qty	E	E/m2 (of GIFA)	E/unit	Qty	E	E/m2 (of GIFA)	E/unit	Qty	E	E/m2 (of GIFA)	E/unit	Qty	E	E/m2 (of GIFA)	E/unit	Qty	E	E/m2 (of GIFA)	E/unit	
<b>(0.1) FACILITATING WORKS</b>																															
Taken from separate detail																															
<b>(0.0) TOTAL - FACILITATING WORKS</b>																															
<b>(1.1) FOUNDATIONS</b>																															
Elemental Unit Rate																															
Substructure																															
Piled foundations	per m <sup>2</sup>	190	94	17,825	8	557	112	21,248	6	443	91	17,293	5	298	98	18,592	5	310	152	28,896	33	2,408	742	140,980	173	155	29,386	4	140		
eo for enhanced foundations for high-rise	per m <sup>2</sup>	50	94	4,691	2	147	112	5,592	1	116	91	4,551	1	78	98	4,893	1	82	152	37,100	45	155	742	37,100	45	155	7,733	1	37		
Pile caps & ground beams	per m <sup>2</sup>	180	94	16,887	7	528	112	20,130	5	419	91	16,383	4	282	98	17,614	4	294	152	27,375	32	2,281	742	133,560	164	155	27,839	3	133		
Raft foundations above London Underground tunnels	per m <sup>2</sup>	290	40	11,654	5	364	48	13,969	4	291	39	11,306	3	195	42	12,223	3	204	65	18,826	22	1,569	171	49,467	61	542	157,278	19	749		
Blockwork - internal walls, say	per m	60	28	1,651	1	52	37	2,224	1	46	25	1,509	0	26	28	1,662	0	28	42	2,544	3	212	55	3,309	4	799	47,955	6	228		
External cavity wall up to DPC	per m	90	33	2,970	1	93	44	3,993	1	83	28	2,543	1	44	36	3,217	1	54	82	7,347	8	612	94	8,435	10	23	2,078	0	10		
Extra over allowance for works above London Underground tunnels	item	50,000	1	50,000	22	1,563	1	50,000	13	1,042	1	50,000	13	862	1	50,000	12	833	1	50,000	58	4,167	1	50,000	61	1	50,000	6	238		
Sundries (obstructions, etc.)	%	5		5,284	2	165		5,858	2	122		5,179	1	89		5,410	1	90		6,749	6	562		21,143	26		16,113	2	77		
Form new lift pit	per m <sup>3</sup>	20																													
Excavation	per m <sup>3</sup>	50																													
Disposal off site	per m <sup>3</sup>	40																													
EWS	per m <sup>2</sup>	70																													
Formwork	per m <sup>2</sup>	450																													
Concrete walls	per m <sup>2</sup>	200																													
Granular to make up levels	per m <sup>3</sup>	200																													
<b>(1.2) GROUND FLOOR CONSTRUCTION</b>																															
Excavation; ground slab areas	per m <sup>2</sup>	20	134	2,680	1	84	160	3,200	1	67	130	2,600	1	45	140	2,800	1	47	217	4,340	5	362	742	14,840	18	697	13,940	2	66		
Disposal off site	per m <sup>3</sup>	50	101	5,025	2	157	120	6,000	2	125	98	4,875	1	84	105	5,250	1	88	163	8,138	9	678	557	27,825	34	523	26,138	3	124		
Concrete slab	per m <sup>2</sup>	200	134	26,800	12	838	160	32,000	8	667	130	26,000	7	448	140	28,000	7	467	217	43,400	50	3,617	571	114,285	140	155	30,933	4	147		
<b>(1) TOTAL - SUBSTRUCTURE</b>																															
145,466 64 4,546 164,212 43 3,421 142,238 38 2,452 149,659 36 2,494 197,615 227 16,468 600,943 736 437,953 53 2,085																															
<b>(2.1) FRAME</b>																															
Structural frames																															
Concrete frame and upper floors	per m <sup>2</sup>	270	2,256	609,196	270	19,037	3,797	1,025,290	270	21,360	3,736	1,008,790	270	17,383	4,115	1,111,099	270	18,518	869	234,641	270	19,553	571	154,284	189	8,294	2,239,358	270	10,664		
eo for enhanced frame to high-rise	per m <sup>2</sup>	40	2,256	90,251	40	2,820	3,797	151,895	40	3,164	3,736	149,450	40	2,577	4,115	164,607	40	2,743								8,294	331,757	40	1,580		
Roof terrace construction; communal garden at first floor	per m <sup>2</sup>	310																								521	161,510	19	769		
Allowance for concrete frame	per m <sup>2</sup>	310																													
<b>(2.2) UPPER FLOORS</b>																															
Upper floors																															
In situ concrete upper floors	Incl in 2.1																														
Balconies	Incl in 2.1																														
Concrete inset	per m <sup>2</sup>	550	209	114,752	51	3,586	415	228,393	60	4,758	422	232,078	62	4,001	421	231,572	56	3,860	97	53,306	61	4,442	571	30,306	33	2,423					
Concrete paving slabs on bearing	per m <sup>2</sup>	300	209	62,592	28	1,956	415	124,578	33	2,595	422	126,588	34	2,183	421	126,312	31	2,105	97	29,076	33	2,423									
External Walkways	Incl in 2.1																														
Concrete external walkways (balustrade incl elsewhere)	per m <sup>2</sup>	500																	173	86,480	100	7,207									
<b>(2.3) ROOF</b>																															
Roof structure																															
Incl in frame	Incl in 2.1																														
Roof coverings	per m <sup>2</sup>	300	134	40,200	18	1,256	160	48,000	13	1,000	130	39,000	10	672	140	42,000	10	700	217	65,100	75	5,425	571	171,427	210	155	46,399	6	221		
Roof covering	per m <sup>2</sup>	100																													
Soffit treatment to undercroft	per m <sup>2</sup>	100																													
Roof furniture	item	5,000	1	5,000	2	156	1	5,000	1	104	1	5,000	1	86	1	5,000	1	83	1	5,000	6	417	1	5,000	6	1	5,000	1	24		
Roof structure; main	per no.	2,000																													
Lift override housings; concrete	per no.	2,000																													
Roof drainage	per m <sup>2</sup>	25	134	3,350	1	105	160	4,000	1	83	130	3,250	1	56	140	3,500	1	58	217	5,425	6	452	571	14,286	18	155	3,867	0	18		
Rainwater goods	per m <sup>2</sup>	25	134	3,350	1	105	160	4,000	1	83	130	3,250	1	56	140	3,500	1	58	217	5,425	6	452	571	14,286	18	155	3,867	0	18		
Roof lights, skylights and openings	per no.	2,000																													
ADJ	per no.	2,500																													
Roof access hatch & ladder; 1200 x 1200	per no.	15,000	1	15,000	7	469	1	15,000	4	313	1	15,000	4	259	1	15,000	4	250	1	15,000	17	1,250									
Mansafe	per no.	15,000	1	15,000	7	469	1	15,000	4	313	1	15,000	4	259	1	15,000	4	250	1	15,000	17	1,250									
Roof Terraces	per m <sup>2</sup>	250	134	33,500	15	1,047	160	40,000	11	833	130	32,500	9	560	140	35,000	9	583													
Allowance for roof terraces	per m <sup>2</sup>	250	134	33,500	15	1,047	160	40,000	11	833	130	32,500	9	560	140	35,000	9	583													
Allowance for metal railings	per m	450	33	14,851	7	484	44	19,963	5	416	28	12,716	3	218	36	16,083	4	268													
Sundries	%	5		2,428	1	76		2,850	1	59		2,383	1	41		2,525	1	42													
<b>(2.4) STAIRS</b>																															
Stair/ramp structures;																															
Main stair; concrete u-shaped	per rise	4,000																													
Stair/ramp finishes	Incl under finishes																														
Incl under finishes	Incl under finishes																														
Stair/ramp balustrades and handrails	per rise	2,000																													
Main stair	per rise	2,000																													
<b>(2.5) EXTERNAL WALLS</b>																															
Wall: floor ratio																															
74%	74%																														
69%	69%																														
79%	79%																														
118%	118%																														
73%	73%																														
27%	27%																														
External enclosing walls above ground level																															
100mm SFS system	per m <sup>2</sup>	140	1,663	232,865	103	7,277	2,795	391,273	103	8,152	2,581	361,397	97	6,231	3,265	457,072	111	7,618	1,029	144,004	166	12,000	598	83,712	103	2,254	315,611	38	1,503		
Forming cavities (ties, etc.)	per m <sup>2</sup>	50	1,663	83,166	37	2,599	2,795	139,741	37	2,911	2,581																				

ELEMENT	Unit	Rate	Block A - Residential				Block B - Residential				Block C - Residential				Block D - Residential				Block E - Residential				Commercial - Shell & Core				Circulation, Plant, Refuse etc.				
			Qty	£	€/m2 (of GIFA)	€/unit	Qty	£	€/m2 (of GIFA)	€/unit	Qty	£	€/m2 (of GIFA)	€/unit	Qty	£	€/m2 (of GIFA)	€/unit	Qty	£	€/m2 (of GIFA)	€/unit	Qty	£	€/m2 (of GIFA)	€/unit	Qty	£	€/m2 (of GIFA)	€/unit	
<b>(2) TOTAL SUPERSTRUCTURE</b>			-	180,800	80	5,650	-	271,200	71	5,650	-	327,700	88	5,650	-	339,000	82	5,650	-	53,400	61	4,450	-	0	0	-	-	120,900	15	576	
<b>(3.1) WALL FINISHES</b>			-	2,918,373	1,293	91,199	-	4,830,730	1,272	100,640	-	4,743,592	1,270	81,786	-	5,425,623	1,318	90,427	-	1,599,224	1,640	133,260	-	943,070	1,155	-	-	5,971,082	720	28,434	
Finishes to walls																															
Skim to external and party walls	per m2	15	4,438	66,566	30	2,080	7,464	111,963	29	2,333	7,176	107,635	29	1,856	8,325	124,875	30	2,081	2,097	31,458	36	2,622	1,302	19,525	24	12,453	186,793	23	889		
Skim to plasterboard partitions	per m2	15	4,160	62,400	28	1,950	6,240	93,600	25	1,950	7,540	113,100	30	1,950	7,800	117,000	28	1,950	1,560	23,400	27	1,950									
Wall tiling																															
To bathrooms	per no	400	32	12,800	6	400	48	19,200	5	400	58	23,200	6	400	60	24,000	6	400													
Kitchen splashbacks	per no	300	32	9,600	4	300	48	14,400	4	300	58	17,400	5	300	60	18,000	4	300	12	3,600	4	300									
Silestone splashback to match worktops																															
Decoration																															
Walls and ceilings	per m2	9	8,566	77,092	34	2,409	13,656	122,906	32	2,561	14,658	131,919	35	2,274	16,065	144,585	35	2,410	3,645	32,807	38	2,734				12,453	112,076	14	534		
Allowance for wall finishes to retail	per m²	30																					1,302	39,050	48						
Allowance for feature artwork to circulation	item	150,000																					1	150,000			1	150,000	18	714	
<b>(3.2) FLOOR FINISHES</b>			-	228,457	101	7,139	-	382,069	95	7,543	-	393,254	105	6,780	-	428,459	104	7,141	-	96,065	111	8,005	-	58,574	72	-	-	448,869	54	2,137	
Finishes to floors																															
Scotex & insulation	per m2	45	2,256	101,533	45	3,173	3,797	170,882	45	3,560	3,736	168,132	45	2,899	4,115	185,183	45	3,086	869	39,107	45	3,259	571	25,714	32	8,294	373,226	45	1,777		
Circulation																															
Bin store, plant, cycle, etc.	per m2	35																									8,294	290,287	35	1,382	
Carpet, GF lobby	per m2	40																									570	22,790	3	109	
Entrance matting	per m2	500																									16	8,000	1	88	
Flats																															
Timber floorboards to bedrooms	per m2	80	640	51,200	23	1,600	960	76,800	20	1,600	1,160	92,800	25	1,600	1,200	96,000	23	1,600	240	19,200	22	1,600									
Timber floorboards to Kitchen / lounge / dining	per m2	80	1,344	107,520	48	3,360	2,016	161,280	42	3,360	2,436	194,880	52	3,360	2,520	201,600	49	3,360	504	40,320	46	3,360									
Tiling to bathrooms	per m2	60	160	9,600	4	300	240	14,400	4	300	290	17,400	5	300	300	18,000	4	300	60	3,600	4	300									
Skirting's																															
Timber skirting's; painted	per m	12	3,244	38,933	17	1,217	5,171	62,057	16	1,293	5,553	66,637	18	1,149	6,085	73,019	18	1,217	1,380	16,661	19	1,380					4,981	59,774	7	285	
Allowance for sundries (threshold strips, etc.)	%	1		3,088	1	96	4,854	1	101																			257	0	1	36
Allowance for floor finishes to retail	per m²	80																					571	45,714	56						
<b>(3.3) CEILING FINISHES</b>			-	311,874	138	9,746	-	490,273	129	10,214	-	545,247	146	9,491	-	579,540	141	9,659	-	119,976	138	9,998	-	71,685	88	-	-	761,618	92	3,627	
Plasterboard and skim; flats	per m2	40	2,209	88,366	39	2,761	3,725	148,996	39	3,104	3,650	146,020	39	2,518	4,020	160,790	39	2,680	848	33,933	39	2,828									
Access panels, say	per no	125	32	4,000	2	125	48	6,000	2	125	58	7,250	2	125	60	7,500	2	125	12	1,500	2	125									
Painted ceiling finish to plant, refuse, etc.	per m2	9																										8,294	74,645	9	355
Ceiling to circulation, acoustic quality	per m2	50																										570	28,488	3	136
Allowance for ceiling finishes to retail	per m²	60																					571	34,285	42						
<b>(4) TOTAL - INTERNAL FINISHES</b>			-	92,366	41	2,886	-	154,996	41	3,229	-	153,270	41	2,643	-	168,290	41	2,885	-	35,433	41	2,953	-	34,285	42	-	-	103,133	12	491	
<b>(4) FITTINGS</b>			-	632,697	280	10,772	-	1,007,337	265	20,986	-	1,091,770	292	18,824	-	1,176,289	286	19,605	-	251,473	289	20,956	-	164,545	202	-	-	1,313,621	158	6,255	
<b>(4) DOMESTIC KITCHEN FITTINGS</b>																															
Domestic kitchen fittings																															
Kitchen	per no	5,000	32	160,000	71	5,000	48	240,000	63	5,000	58	290,000	78	5,000	60	300,000	73	5,000	12	60,000	69	5,000									
Eo for M4(3) adjustable worktops	per no	2,000	16	32,000	14	1,000	24	48,000	13	1,000	6	12,000	3	200	4	8,000	9	667													
Kitchen Appliances																															
Allowance for White Goods	per no	2,000	19	38,000	17	1,188	29	58,000	15	1,208	35	70,000	19	1,207	36	72,000	17	1,200	8	16,000	18	1,333									
Removable slatted shelving	per no	500	32	16,000	7	500	48	24,000	6	500	58	29,000	8	500	60	30,000	7	500	12	6,000	7	500									
Post Boxes	per no	100	32	3,200	1	100	48	4,800	1	100	58	5,800	2	100	60	6,000	1	100	12	1,200	1	100									
Allowance per unit																															
Signs and notices	per m2	2	2,256	4,513	2	141	3,797	7,595	2	158	3,736	7,473	2	129	4,115	8,230	2	137	869	1,738	2	145					8,294	16,588	2	79	
General fittings	item	500	32	16,000	7	500	48	24,000	6	500	58	29,000	8	500	60	30,000	7	500	12	6,000	7	500						1	500	0	2
Misc. (shelving, etc.)																															
Window bins	per m²	70	499	34,930	15	1,092	838	58,691	15	1,223	774	54,210	15	935	979	68,561	17	1,143	309	21,601	25	1,800									
Vanity Units																															
Boxing behind WC's and WHB's	per no	400	32	12,800	6	400	48	19,200	5	400	58	23,200	6	400	60	24,000	6	400	12	4,800	6	400									
Vanity units above WHB's	per no																														

ELEMENT	Unit	Rate	Block A - Residential				Block B - Residential				Block C - Residential				Block D - Residential				Block E - Residential				Commercial - Shell & Core				Circulation, Plant, Refuse etc.			
			Qty	£	£/m2 (of GIFA)	£/unit	Qty	£	£/m2 (of GIFA)	£/unit	Qty	£	£/m2 (of GIFA)	£/unit	Qty	£	£/m2 (of GIFA)	£/unit	Qty	£	£/m2 (of GIFA)	£/unit	Qty	£	£/m2 (of GIFA)	£/unit	Qty	£	£/m2 (of GIFA)	£/unit
Emergency lighting	per m2	15	2,256	33,844	15	1,058	3,797	56,961	15	1,187	3,736	56,044	15	960	4,115	61,728	15	1,029	869	13,036	15	1,066	8,294	124,409	15	592	8,294	16,588	2	79
Earthing and bonding	per m2	2	2,256	4,513	2	141	3,797	7,595	2	158	3,736	7,473	2	129	4,115	8,230	2	137	869	1,738	2	145	742	40,823	5	194				
Lighting to underground car park	per m2	55																												
(5.8) GAS AND OTHER FUEL INSTALLATIONS				402,768	179	12,586		674,353	178	14,049		669,964	179	11,551		735,581	179	12,260		147,737	170	12,311		77,085	94		1,450,789	175	6,909	
Allowance for gas connection	per no.	1,000	32	32,000	14	1,000	48	48,000	13	1,000	58	58,000	16	1,000	60	60,000	15	1,000	12	12,000	14	1,000								
(5.9) LIFT INSTALLATIONS				32,000	14	1,000		48,000	13	1,000		58,000	16	1,000		60,000	15	1,000		12,000	14	1,000		0	0		0	0	0	
Passenger lift; assume 12 person and fire evac	per rise	25,000																					31	775,000						
Passenger lift; assume 12 person and fire evac	per rise	25,000																					31	775,000						
Passenger lift; assume 12 person and fire evac	per rise	25,000																					31	775,000						
Back-up generator for fire evac, assume 1 per 2 lifts	per rise	10,000																					2	20,000						
(5.10) FIRE AND LIGHTNING PROTECTION				0	0	0		0	0	0		0	0	0		0	0	0		0	0			3,120,000	376	14,857				
Fire fighting systems																														
Fire alarm system	per m2	30	2,256	67,688	30	2,115	3,797	113,921	30	2,373	3,736	112,088	30	1,933	4,115	123,455	30	2,058	869	26,071	30	2,173	571	17,130	17,130	8,294	248,818	30	1,185	
Sprinklers																														
Sprinkler system; eo for enhanced system to new CAT 4 requirements	per m2	30	2,256	67,688	30	2,115	3,797	113,921	30	2,373	3,736	112,088	30	1,933	4,115	123,455	30	2,058	869	26,071	30	2,173	571	17,130	17,130	8,294	248,818	30	1,185	
to underground car park	per m2	30	2,256	22,563	1,410	55,539	3,797	37,974	1,899	95,934	3,736	37,363	1,288	93,407	4,115	41,152	1,419	102,880												
Lightning protection																														
Allowance for lightning protection	per m2	3	2,256	6,769	423	16,662	3,797	11,392	570	28,780	3,736	11,209	387	28,022	4,115	12,346	426	30,864	869	2,607	652	7,821	571	1,713	1,713	8,294	24,882	803	118	
(5.11) COMMUNICATION, SECURITY AND CONTROL SYSTEMS				164,708	10,294	405,436		277,208	13,860	700,315		272,747	9,405	681,847		300,408	10,359	751,020		54,750	13,687	164,249		35,973	35,973		627,723	20,249	2,988	
TV/Satellite/IRIS system	per no.	400	32	12,800	800	31,508	48	19,200	960	48,505	58	23,200	800	58,000	60	24,000	828	60,000	12	4,800	1,200	14,400								
Door entry system	per no.	600	32	19,200	1,200	47,262	48	28,800	1,440	72,758	58	34,800	1,200	47,000	60	36,000	1,241	90,000	12	7,200	1,800	21,600								
Fob access, push button release	per no.	500	32	16,000	1,000	39,385	48	24,000	1,200	60,632	58	29,000	1,000	72,500	60	30,000	1,034	75,000	12	6,000	1,500	18,000								
CCTV system to communal areas	per m²	40																					571	22,840	22,840	8,294	331,757	10,702	1,580	
(5.12) SPECIALIST INSTALLATIONS				48,000	3,000	118,154		72,000	3,600	181,895		87,000	3,000	217,500		90,000	3,103	225,000		18,000	4,500	94,000		22,840	22,840		331,757	10,702	1,580	
PV panels assumed as 30% of roof area	per m²	600	40	24,120	11	754	48	28,800	8	600	39	23,400	6	403	42	25,200	6	420	65	39,060	45	3,255		0	0		46	27,839	3	133
(5.13) BWIC WITH SERVICES				24,120	11	754		28,800	8	600		23,400	6	403		25,200	6	420		39,060	45	3,255		0	0		46	27,839	3	133
BWIC with M&E installation	%	2.5		32,691	14	1,022		52,185	14	1,087		54,614	15	942		58,798	14	980		12,752	15	1,063		6,526	8		147,989	18	705	
(5.14) TESTING & COMMISSIONING				32,691	14	1,022		52,185	14	1,087		54,614	15	942		58,798	14	980		12,752	15	1,063		6,526	8		147,989	18	705	
Testing & commissioning/O&M Manuals	%	2		26,621	12	832		26,621	7	555		26,621	7	459		26,621	6	444		26,621	31	2,218		1,009	1		26,621	3	127	
Attendance	%	2		26,621	12	832		26,621	7	555		26,621	7	459		26,621	6	444		26,621	31	2,218		1,009	1		26,621	3	127	
(5) TOTAL - M & E SERVICES				53,241	24	1,684		53,241	14	1,109		53,241	14	918		53,241	13	887		53,241	61	4,437		2,018	2		53,241	6	254	
SUB TOTAL - FACILITATING & BUILDING WORKS				5,453,960	2,417	170,436		8,748,992	2,304	182,271		8,862,800	2,372	152,807		9,853,304	2,394	164,222		2,767,113	3,184	230,593		2,263,855	2,773		15,712,566	1,894	74,622	
(6.0) SITE WORKS																														
Included in separate detail																														
(6.2) ROADS, PATHS AND SURFACES																														
Included in separate detail																														
(6.3) SOFT LANDSCAPING, PLANTING																														
Included in separate detail																														
(6.4) FENCING, RAILINGS AND WALLS																														
Included in separate detail																														
(6.5) STREET FURNITURE AND EQUIPMENT																														
Included in separate detail																														
(6.6) UNDERGROUND DRAINAGE																														
Included in separate detail																														
(6.7) EXTERNAL SERVICES																														
Included in separate detail																														
(6.8) TOTAL - SITE WORKS				0	0	0		0	0	0		0	0	0		0	0	0		0	0		0	0		0	0		0	
SUB TOTAL - BUILDING WORKS ESTIMATE				5,453,960	2,417	170,436		8,748,992	2,304	182,271		8,862,800	2,372	152,807		9,853,304	2,394	164,222		2,767,113	3,184	230,593		2,263,855	2,773		15,712,566	1,894	74,622	
(7.1) PRELIMINARIES	16.00%			872,634	387	27,270		1,399,639	369	29,163		1,418,048	380	29,449		1,576,529	383	29,275		442,738	509	36,895		362,217	444		2,514,010	303		
(8.1) PROFIT & OVERHEADS	8.00%			506,127	224	15,816		811,906	214	16,915		822,468	220	14,180		914,387	222	15,240		256,788	295	21,390		210,086	257		1,458,126	176		
SUB-TOTAL				6,832,721	3,028	213,523		10,960,737	2,886	228,349		11,103,315	2,972	191,436		12,344,220	3,000	205,727		3,466,640	3,989	286,867		2,836,157	3,474	</				

Appendix B - Enabling Works and External Works Detail

			Facilitating Works				External Works			
Number of units:			210 nr				210 nr			
Total Gross Internal Floor Area:			23,884 m2				23,884 m2			
Site area; total			3,952 m2				3,952 m2			
ELEMENT	Unit	Rate	Qty	£	£/m2	£/unit	Qty	£	£/m2	£/unit
			(of GIFA)				(of GIFA)			
(0.1) TOXIC/HAZARDOUS MATERIAL REMOVAL										
Removal of contaminated soil										
Removal of contaminated soil	excl									
			-	0	0	0	-	0	0	0
(0.2) MAJOR DEMOLITION WORKS										
Site clearance										
Allowance for site clearance	per m2	5	3,952	19,758	1	94				
Allowance for services disconnections										
Gas	per m2	25	3,952	98,792	4	470				
Water	per m2	25	3,952	98,792	4	470				
Electric	per m2	25	3,952	98,792	4	470				
BT	per m2	25	3,952	98,792	4	470				
Sewer - Culvert Diversion										
Allowance for new pumping station / diversions	item	150,000	1	150,000	6	714				
BWIC with disconnections (excavations, etc.)	%	20	1	30,000	1	143				
			-	594,927	25	2,833				
(0.3) FENCING										
Site hoarding	per m	120	279	33,430	1	159				
			-	33,430	1	159	-	0	0	0
(0.4) EXTRAORDINARY SITE INVESTIGATION & MITIGATION WORKS										
Allowance for monitoring and survey costs associated with the London Underground tunnels	item	60,000	1	60,000	3	286				
			-	60,000	3	286	-	0	0	0
<b>(0.0) TOTAL - FACILITATING WORKS</b>				<b>688,357</b>	<b>29</b>	<b>3,278</b>		<b>0</b>	<b>0</b>	<b>0</b>
(6.1) SITE PREPERATION WORKS										
Allowance for site preparation works	per m <sup>2</sup>	15					3,952	59,275	2	282
			-				-	59,275	2	282
(6.2) ROADS, PATHS AND SURFACES										
Paths and Pavings										
Allowance for paths and pavings to public realm	per m <sup>2</sup>	90					1,594	143,461	6	683
Allowance for pavings to roof terrace	per m <sup>2</sup>	110					1,085	119,350	5	568
			-				-	262,811	11	1,251
(6.3) SOFT LANDSCAPING, PLANTING										
Soft landscaping										
Allowance for soft landscaping to public realm	per m <sup>2</sup>	60					1,594	95,641	4	455
Allowance for soft landscaping roof terrace	per m <sup>2</sup>	70					1,085	75,950	3	362
			-				-	171,591	7	817
(6.4) FENCING, RAILINGS AND WALLS										
Fencing										
Allowance for Fencing, Railing etc.	item	25,000					1	25,000	1	119
			-				-	25,000	1	119
(6.5) STREET FURNITURE AND EQUIPMENT										
Allowance for street furniture and equipment	item	150,000					1	150,000	6	714
eo for moveable market stalls and the like	excl									
Allowance for pergola to 31st floor (3.15m high)	per m <sup>2</sup>	400					46	18,203	1	87
Allowance for public artwork	excl									
			-				-	168,203	7	801
(6.6) UNDERGROUND DRAINAGE										
Surface water and foul drainage										



2 Berol Yard, Tottenham Hale, London

Order of Cost Estimate Rev E

7 February 2025

Appendix C - Cost Detail - Bridgehead, External Staircase and New Lift

			Bridgehead	
ELEMENT	Unit	Rate	Qty	£
<b>(1.1) FOUNDATIONS</b>				
Elemental Unit Rate				
Piled Foundations				
Sub-contractor prelims	%	10		3,403
Plant and labour	wks	1,000	4	4,000
Warranties etc.	item	1,500	1	1,500
Pilling mat				
Temporary design	item	1,000	1	1,000
Supply and lay terram	per m2	15	56	835
Supply and lay 300mm thick mat	per m3	60	17	1,002
Disposal, say 50%	per m3	60	8	501
Mobilisation	item	4,000	1	4,000
Move plant to pile position and set up	per no	30	12	360
Setting out pile positions	per no	25	12	300
Pile diameter: assume 450mm: Depth: 11m	per no	450	12	5,400
Reinforcement	per no	200	12	2,400
Disposal of pile arisings	per m3	60	8	501
Integrity	per no	25	12	300
Cutting off tops of piles	per no	70	12	840
Pile Caps				
Allowance for pile cap	per nr.	600	12	7,200
Substructure				
Excavation; ground slab areas	per m3	30	56	1,670
Disposal off site	per m3	60	56	3,339
Level and compact bottoms of excavations	per m2	2	56	111
Blinding bottoms of excavations	per m2	3	56	167
Earthwork support	per m2	40	56	2,226
Sundries (obstructions, etc.)	%	5		1,883
Form new lift pit				
Excavation	per m3	30	8	240
Disposal off site	per m3	60	8	480
EWS	per m2	40	16	640
Formwork	per m2	70	16	1,120
Concrete walls	per m2	250	16	4,000
Granular to make up levels	per m3	200	1	280

2 Berol Yard, Tottenham Hale, London

Order of Cost Estimate Rev E

7 February 2025

Appendix C - Cost Detail - Bridgehead, External Staircase and New Lift

			Bridgehead	
ELEMENT	Unit	Rate	Qty	£
RC slab	per m2	250	4	1,000
			-	50,697
<b>(1.2) FLOOR CONSTRUCTION</b>				
To GF construction				
200mm RC slab	per m2	250	56	13,913
Formwork to slab	per m2	70	11	779
To bridgehead, stairs				
150mm RC slab	per m2	200	50	10,000
Metal decking	per m2	110	50	5,500
15mm dia sheer studs	per m2	50	50	2,500
			-	32,692
<b>(1) TOTAL - SUBSTRUCTURE</b>				<b>83,388</b>
<b>(2.1) FRAME</b>				
Structural frames				
Steel frame (incl girders and columns etc.)	tonne	8,000	5	36,851
Allowance for Free Sliding Bearings	per no.	3,500	4	14,000
			-	50,851
<b>(2.2) UPPER FLOORS</b>				
Included in 1.2				
<b>(2.3) ROOF</b>				
Roof structure				
Roof to lift structure	per m2	200	12	2,400
Roof coverings				
Flat roof	per m2	150	12	1,800
Sundries	%	5		210
			-	4,410
<b>(2.4) STAIRS</b>				
Stair structures; Frame included above				
Stair; concrete 3m wide	per no.	2,000	6	12,000
Stair handrails				

2 Berol Yard, Tottenham Hale, London

Order of Cost Estimate Rev E

7 February 2025

Appendix C - Cost Detail - Bridgehead, External Staircase and New Lift

			Bridgehead	
ELEMENT	Unit	Rate	Qty	£
Hardwood handrail (weather protected)	per m	80	115	9,213
Floor finish				
Asphalt to concrete	per m <sup>2</sup>	80	82	6,560
Balustrading				
Cor-Ten steel balustrading	per m	550	115	63,338
				91,111
(2.5) EXTERNAL WALLS				
Wall build-up:-				
Lift shaft structure	per m2	200	119	23,720
Coloured glazed brick slip	per m2	90	119	10,674
Sundries	%	5		1,720
				36,114
(2.6) WINDOWS & EXTERNAL DOORS				
(2.7) INTERNAL WALLS				
(2.8) INTERNAL DOORS				
(2) TOTAL - SUPERSTRUCTURE				182,486
(3.1) WALL FINISHES				
(3.2) FLOOR FINISHES				
(3.3) CEILING FINISHES				
(3) TOTAL - INTERNAL FINISHES				0
(4) FITTINGS				
				0
(4) TOTAL - FITTINGS				0
(5.1) SANITARY FITTINGS				
(5.2) DISPOSAL INSTALLATIONS				
(5.3) WATER INSTALLATIONS				

2 Berol Yard, Tottenham Hale, London

Order of Cost Estimate Rev E

7 February 2025

Appendix C - Cost Detail - Bridgehead, External Staircase and New Lift

			Bridgehead	
ELEMENT	Unit	Rate	Qty	£
(5.4) HEAT SOURCE				
(5.5) SPACE HEATING				
(5.6) VENTILATION SYSTEMS				
(5.7) ELECTRICAL INSTALLATIONS				
External lighting; to lift, staircase and bridgehead				
Recessed lighting to hand rails; say,	per m.	100	115	11,516
Lift area	per no.	1,200	4	4,800
Bridgehead (top of stairs)	per no.	1,200	4	4,800
Allow. for distribution of power/data (location unknow	item	25,000	1	25,000
				46,116
(5.8) GAS AND OTHER FUEL INSTALLATIONS				
(5.9) LIFT INSTALLATIONS				
External Grade Passenger lift				
Assume 12 person, to serve 6m high bridge	per no.	40,000	1	40,000
				40,000
(5.10) FIRE AND LIGHTNING PROTECTION				
(5.11) COMMUNICATION, SECURITY AND CONTROL SYSTEMS				
CCTV; integrated within lift and at lift doors				
Allowance for CCTV	item	5,000	1	5,000
Communication system				
Emergency telephone to lift	item	5,000	1	5,000
				10,000
(5.12) SPECIALIST INSTALLATIONS				
(5.13) BWIC WITH SERVICES				
BWIC with M&E installation	%	10.0		9,612

2 Berol Yard, Tottenham Hale, London

Order of Cost Estimate Rev E

7 February 2025

Appendix C - Cost Detail - Bridgehead, External Staircase and New Lift

			Bridgehead	
ELEMENT	Unit	Rate	Qty	£
			-	9,612
(5.14) TESTING & COMMISSIONING				
Testing & commissioning/O&M Manuals	%	2.5		2,403
Attendance	%	2.5		2,403
			-	4,806
<b>(5) TOTAL - M &amp; E SERVICES</b>				<b>110,533</b>
<b>SUB TOTAL - BUILDING WORKS</b>				<b>376,407</b>
(7.1) PRELIMINARIES		16.00%		60,225
(8.1) PROFIT & OVERHEADS		8.00%		34,931
<b>SUB-TOTAL</b>				<b>471,563</b>
(9.1) Design Development Risk		5.00%		23,985
(9.2) Pricing and Construction Risk		5.00%		25,184
<b>SUB-TOTAL</b>				<b>528,862</b>
(10.1) Contractor Fees		2.50%		13,192
<b>TOTAL (BEFORE INFLATION)</b>				<b>542,054</b>
(11.1) ALLOWANCE FOR TENDER PRICE INFLATION		6.92%		37,527
(11.2) ALLOWANCE FOR CONSTRUCTION INFLATION		5.84%		33,420
<b>TOTAL ESTIMATED COST</b>				<b>613,000</b>

## Assessment of Financial Viability

GLA Case Number:	2025/0371
Scheme Address:	Berol Quarter, N17 9LJ
Applicant:	Berol Quarter Limited
Local Planning Authority:	London Borough of Haringey
Date:	14 August 2025
Prepared by:	Luke Kon David Nip MRICS

### 1. Introduction

- 1.1 This document represents the position of the Greater London Authority's Viability Team in relation to the following viability submission made concerning the planning application on this site:
- *Financial Viability Assessment Berol Quarter, N17 9LJ ("FVA")* prepared by DS2 LLP ("DS2") on behalf of the Applicant, dated April 2025.
  - *Review of Applicant's Financial Viability Assessment ("FVA review")* prepared by Carter Jonas on behalf of LB Haringey, dated July 2025
- 1.2 In this review, the GLA's Viability Team consider the extent to which the viability assessments submitted comply with the London Plan 2021 and Mayoral, National and Professional Guidance.
- 1.3 This report has been prepared to advise the GLA's Development Management Team and the Mayor of London, and is also provided to the LPA and Applicant. Relevant professional guidance has been taken into account, and this is confirmed in Section 12 of this report.
- 1.4 This document covers the following:
- Proposed development and affordable housing.
  - Site and context.
  - Form and methodology of the FVA and Review.
  - Viability inputs
  - Gross Development Value.
  - Development Costs.
  - Benchmark Land Value.
  - Appraisal results and analysis.
  - Overall comment and recommended next steps.
  - Photographs and plans.

## 2. Non-Technical Summary

### Scope of Report

- 2.1 This report constitutes a review of the *Financial Viability Assessment Berol Quarter, N17 9LJ* ("FVA"), prepared on behalf of the Applicant (Berol Quarter Limited) in relation to the planning application (GLA Reference: 2025/0371) at Berol Quarter, N17 9LJ within the London Borough of Haringey.
- 2.2 It also comments on the FVA review prepared by Carter Jonas (CJ).
- 2.3 The report considers whether the proposed affordable housing offer, as set out in the submission documents and the FVA, represents the maximum viable amount at the application stage.

### Proposed development

- 2.4 The planning application seeks permission for the 210 residential units as a Build to Rent ("BTR") development, with retail space, office space, and amenity space associated with the BTR units.
- 2.5 The original development consented to 35% affordable housing by habitable room. The latest s73 application proposes to remove the affordable housing provision in its entirety.

### Conclusions of the Report

- 2.6 The FVA concludes that the proposed scheme incorporating no affordable housing would produce a deficit of -£23,718,207 when the residual land value of -£12,747,164 is compared against a £10,971,043 Benchmark Land Value. DS2 conclude that the proposed scheme with 100% market unit is in deficit.
- 2.7 On behalf of the LPA, CJ reviewed the FVA and advised that the proposed scheme would produce a deficit of -£8,106,056 when the residual land value of -£169,556 is compared against a £7,936,500 Benchmark Land Value. CJ also concluded that the proposed 100% market unit scheme is in deficit.
- 2.8 There are a number of inputs/assumptions adopted in *the* FVA which the GLA disagree at this stage.

These include:

- BTR operating costs
  - BTR rent levels
  - Interim rents
  - Purchasers' costs
  - Benchmark Land Value
- 2.9 The GLA has identified the following additional items of information that should be provided:

- 
- Explanation as to how the scheme with a significant deficit (as modelled in the FVA) can be delivered by the Applicant or another developer.
  - As above, a sense-checking exercise should cross-check the viability assessment's outcome and ensure its robustness.
  - Cultural space – the FVA assume the cultural space to be let at 80% of retail market space with a 3 year rent free period. The Council should confirm whether this is supported in planning terms and whether the rental discount and the rent-free period would be secured by the s106 agreement
  - CIL and S106 Contributions – we request verification of the CIL liability and S106 contributions.
  - Development Programme – We seek further clarification on the 40-month construction period for the BTR block.
  - Clarification on Delivery Model—The FVA does not confirm whether the BTR scheme will be sold or retained after completion. We request clarification on whether a forward funding model is being pursued and recommend an additional appraisal reflecting this scenario.

### 3. Proposed Development and Affordable Housing

3.1 The proposed scheme (LPA Ref: HGY/2025/0930) is described as follows:

*“Application made under Section 73 of the Town and Country Planning Act 1990 to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted 03/03/2025. Permission is sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels. Permission is also sought to alter the permitted level of affordable housing.”*

3.2 The proposed scheme comprises 603sqm (GIA) of Class E accommodation, which is expected to comprise retail uses at ground floor level and 160.2sqm (GIA) of community space at first floor level. It will comprise 210 homes on floors 1 to 29 with associated amenity space.

3.3 The existing Berol House will be refurbished and extended to provide 5,491sqm of Class E commercial floorspace.

#### Residential accommodation schedule

<b>Units</b>	<b>Habitable rooms</b>	<b>Floorspace NIA (sq ft)</b>
210	428	153,514

3.4 Non-residential accommodation schedule

<b>Site</b>	<b>Use</b>	<b>Floorspace NIA (sq ft)</b>
Berol Yard	Retail	6,487
	Cultural	1,724
Berol House	Office	40,009
	Retail	4,844

3.5 The proposed scheme would provide amenity space on three levels: a podium garden at level 2, a residential amenity space at level 1, and a rooftop garden at level 18.

#### Affordable housing

3.6 The proposed scheme does not include affordable housing. This s73 application proposes to remove the 35% affordable housing secured in the original consent granted in March 2025.

## 4. Site and Context

- 4.1 The site is located in Tottenham Hale, within the London Borough of Haringey. It forms part of the Ashley Road South Masterplan (ARSM).
- 4.2 The site area is 0.6 hectares. 2 Berol Yard is a vacant plot, most recently used as a construction site for neighbouring development and temporary car parking. Part of the car park is currently being utilised to construct the One Ashley Road scheme south of the site.
- 4.3 Berol House is a three-story locally listed building. It was built in the early 1900s and completed by 1913. It is made of yellow stock brick and red brick. The building was a former pencil factory owned by the Berol Company, which produced the famous Berol pencil at the site. Currently, Berol House is used as a serviced office building.
- 4.4 The surrounding area has a frontage onto both Ashley Road and Watermead Way. The site is bounded north by Gessner house and south by 1 Ashley Road, another BTR development.
- 4.5 The site has a PTAL rating of 5-6a, indicating excellent public transport accessibility. Tottenham Hale Underground Station is 180m from the site. The site is also within close proximity of Tottenham Hale Bus Station, which is served by eight regular services to Archway Station, Bank, Waterloo, Wood Green, Enfield, Walthamstow, Trafalgar Square, Victoria Bus Station and Kings Cross.
- 4.6 The site is not located within a Conservation Area, and there are no listed buildings within or near the site. Berol House, located in the centre of the site on Ashley Road, is a locally listed building that will be retained and refurbished as part of these development proposals.
- 4.7 The site is located in Flood Zone 2, indicating a moderate probability of flooding.
- 4.8 With respect to the site's most relevant planning history:
- **HGY/2017/2044**  
This was the original hybrid planning application for Berol Yard. It proposed:
    - Full permission for demolition (excluding Berol House) and construction of two buildings (8-14 storeys) with 166 Build to Rent homes, 891 sqm of commercial space, and 7,275 sqm of education floorspace.
    - Outline permission for the conversion and extension of Berol House to provide up to 3,685 sqm of commercial space and 18 residential units.
    -
 Approved in 2018, this scheme was seen as a key part of Tottenham Hale's regeneration, with early and late-stage viability reviews secured and a minimum 35% affordable housing commitment if the college use was dropped.
  - **HGY/2020/0080**  
This was a Reserved Matters application tied to the outline element of the 2017 permission. It focused on:
    - The detailed design, layout, and access for the conversion and extension of Berol House, delivering 3,366 sqm of commercial space and 18 homes.

It was approved in 2020, allowing the Berol House element to move forward with more certainty.

- **Subsequent s96A application**

This is a non-material amendment (HGY/2020/1292) under Section 96A, which:

- Added a condition relating to external materials for Berol House, refining the design control without altering the scheme's substance

- **HGY/2023/0261**

Planning application for the wider Berol Quarter site, submitted after the college proposal fell through. It proposes:

- Refurbishment and extension of Berol House for commercial use (Class E).
- Redevelopment of 2 Berol Yard with 210 Build to Rent homes, 35% affordable (London Living Rent and Discount Market Rent), and ~2,900 sqm uplift in commercial space.
- Public realm improvements, landscaping, and enabling works for a future bridge over Watermead Way.

Approved in March 2025, this scheme reflects a shift from education to residential-led mixed use, while retaining the heritage asset.

- **Section 73 (HGY/2023/0241)**

This s73 application was submitted to remove reference to the phases of the Berol Yard development that are no longer intended to be delivered. This will enable the new planning application submitted at the site to be delivered as a standalone permission.

According to the Council's website, this application is still under consideration.

## 5. Form and Methodology of the FVA

5.1 DS2's assessment adopts a target profit as a fixed input, producing a Residual Land Value which is then compared with a Benchmark Land Value. The RLV is calculated as -£12,747,164, not including the BLV.

5.2 CJ has taken a similar approach to DS2 in their FVA review.

### Delivery model

5.3 DS2's model assumes a 4-month stabilisation period for the appraisal. It is stated that the stabilised yield is applied to the net operating income at the end of the initial leasing period.

## 6. Viability Inputs

### Gross Development Value

Residential Value: OMR Build-to-Rent

- 6.1 The proposed scheme comprises 210 units.
- 6.2 DS2 have conducted a market analysis and identified comparable BTR schemes in the vicinity of the site to inform the inputs in the FVA.
- 6.3 The FVA adopts a gross annual rent value of £6,765,600, reflecting an average rental value of £44 per sq. ft:

DS2 values

Unit Type	No. of Units	Rent			Average Size	
		£pcm	£pcw	£psf	Sq. Ft.	Sq. M.
Studio	21	£2,000	£462	£49	490	46
1b2p	47	£2,400	£554	£51	568	53
2b3p	24	£2,600	£600	£43	719	67
2b4p	90	£2,800	£646	£43	775	72
3b5p	17	£3,300	£762	£37	1,063	99
3b6p	11	£3,500	£808	£40	1,045	97
<b>TOTAL</b>	<b>210</b>	<b>£2,685</b>	<b>£620</b>	<b>£44</b>	<b>731</b>	<b>68</b>

- 6.4 Below is a summary of the comparable used by DS2 in their report, followed by a table summarising the average rental value for all unit mixes.
- 6.5 **The Gessner:** the Gessner is in close proximity to the site and benefits from similar access to public transport and off-site amenities. The scheme provides 158 units. Onsite amenities include communal gardens, concierge, cycle storage, gym, private dining room, co-working area, rooftop terrace, and BBQ areas. There is also a 24-hour concierge and an events programme—these are broadly comparable to the subject scheme. We expect the subject scheme to attract rents similar to those of this development. Rents advertised on the website: [www.wayoflife.com](http://www.wayoflife.com) shows the following (Aug 2025):
- Studios from £2,030 to £2,050 (471sqft to 535sqft) – average £48psf
  - 1-beds from £2,355 to £2,555 (589sqft to 663sqft) – average £47psf
  - 2-beds from £2,750 to £3,015 (798sqft to 916sqft) – average £40psf
  - 3-bed from £3,840 to £3,940 (1079sqft) – average £43psf
- 6.6 **The Sessile:** The Sessile is located adjacent to the subject site and shares similar access to public transport and local amenities. The scheme provides 308 units. Amenities include communal gardens, concierge, cycle storage, gym, private dining room, co-working area, roof terrace, and a 24-hour concierge and events programme. These are broadly comparable to the subject scheme. We expect the subject scheme to

attract rents similar to those of this development. Rents advertised on the website: [www.wayoflife.com](http://www.wayoflife.com) shows the following (Aug 2025):

- 1-beds from £2,390 to £2,640 (532sqft to 670sqft) – average £50psf
- 2-beds from £2,660 to £3,230 (722sqft to 920sqft) – average £43psf
- 3-bed from £3,430 to £4,000 (937 to 1,057sqft) – average £45psf

6.7 **1 Ashley Road:** 1 Ashley Road is in close proximity to the site and benefits from similar access to public transport and off-site amenities. The scheme provides 183 units. Amenities include a residents' lounge, podium garden, fifth-floor roof terrace, and a 24-hour concierge and events programme. These are broadly comparable to the subject scheme. We expect the subject scheme to attract rents similar to those of this development. The only rental information we have gathered (apart from what was reported in the FVA) is a 3-bed property asking for £3,600pm (<https://www.rightmove.co.uk/properties/165473384> - 12 Aug 2025)

6.8 **Equipment Works:** Equipment Works is located near Blackhorse Road in Walthamstow. While it has good access to public transport, the off-site amenity is considered slightly inferior to the subject site. The scheme provides 257 units. Amenities include co-working space, residents' lounge and kitchen, concierge, gym, terrace, screening room, games area, meeting rooms, a courtyard, resident events, car parking (at additional cost), and on-site maintenance. These are broadly comparable to the subject scheme. We expect the subject scheme to attract rents similar to those of this development. Rents advertised on the website: [www.ilivearound.com](http://www.ilivearound.com) shows the following (Aug 2025):

- Studio from £1,975 (434sqft) – average £54psf
- 1-beds from £2,100 to £2,690 (554sqft to 717sqft) – average £45psf
- 2-beds from £2,750 to £2,970 (767sqft to 923sqft) - average £40psf
- 3-bed at £3,265 to £3,380 (977sqft to 1,015sqft) – average £40psf

6.9 **Blackhorse Mills:** Blackhorse Mills is also located near Blackhorse Road in Walthamstow. It has good access to public transport, but the off-site amenity is considered slightly inferior to the subject site. The scheme provides 479 units. Amenities include a gym and yoga studio, rooftop terrace, tennis court, outdoor swimming pool, games room, concierge, residents' lounge, co-working space, and private dining room. These are broadly comparable to the subject scheme. We expect the subject scheme to attract rents similar to those of this development. Rents advertised on Molior (Oct 2024):

- 1-beds from £2,061 to £2,341.
- 2-beds from £2,753 to £2,824.
- The gross annual average is £47 psf

6.10 **Windlass Apartments:** Windlass Apartments is located approximately 440m east of the subject site. It has slightly reduced access to public transport and off-site amenities compared to the subject site. The scheme provides 173 units. Amenities include a residents' lounge, gym, private dining room, and cycle storage. These are slightly inferior to the subject scheme. We would expect the subject scheme to attract higher rents than this development. Rents advertised on Molior (Oct 2024):

- 1-beds from £2,065 to £2,130.
- 2-beds from £2,560 to £2,625.
- 3-beds from £3,480 to £3,500.
- The gross annual average is £41 psf

- 6.11 CJ have reviewed the BTR values and stated that the asking rents in the comparable evidence range from £41psf to £47psf, with the majority clustering between £45-£47psf. CJ concluded that the evidence is representative of current market conditions and do not take issue with the rents adopted in the FVA.
- 6.12 Regeneration Premium: As the subject site is one of the last plots to come forward in the masterplan, GLAVT would estimate an uplift of 5% to the rents to reflect the placemaking and public realms improvement works in comparison to the current day asking rents.
- 6.13 Therefore, the GLAVT consider the following rates to reflect the current rental values achievable for the subject scheme:

GLAVT comments – BTR values

Unit Type	No. of Units	Rent			Average Size	
		£pcm	£pcw	£psf	Sq. Ft.	Sq. M.
Studio	21	£2,100	£484	£51.42	490	46
1b2p	47	£2,520	£582	£53.24	568	53
2b3p	24	£2,730	£630	£45.56	719	67
2b4p	90	£2,940	£678	£45.52	775	72
3b5p	17	£3,465	£799	£39.12	1,063	99
3b6p	11	£3,675	£848	£42.20	1,045	97
<b>TOTAL</b>	<b>210</b>	<b>£2,819</b>	<b>£650</b>	<b>£46.28</b>	<b>731</b>	<b>68</b>

The above results in a gross annual rent of £7,103,880 for the BTR units, reflecting an average rate of £46.28psf, which is within the range of the average rental values of the comparable evidence within the area. We have adopted this in our appraisal.

Operating Costs

- 6.14 DS2 have assumed a 25% reduction in gross rental income to cover the operating costs (OPEX) of the scheme. This is equivalent to £8,054 per unit per annum. No evidence has been provided in the FVA to support the assumption, apart from the reference to Grainger's report on 28.9% OPEX in the full year results (conversely, GLA officers have cited a report of 25% OPEX for Grainger in another scheme at Elephant West).
- 6.15 CJ have assumed an allowance of 22.5% on OPEX, stating that the assumed costs over £8,000 per unit appear high and advised that they typically expect operating costs in the range of £5,500-£7,000 per unit.
- 6.16 The following schemes were referenced in CJ's FVA review:

- The Waitrose, Bromley South (353 units) BTR scheme reflected an OPEX of £5,830 per unit.
- The Waitrose, West Ealing (428 units) scheme reflected an OPEX of £5,680 per unit.
- A 228-unit mixed-use BTR scheme on Sedgemere Road, Abbey Wood (SE2) was agreed at a 22.5% operating cost.
- The Broad Street Mall development, where DS2 acted as viability advisor, applied the same 22.5%.

6.17 GLA officers have reviewed the proposed BTR scheme and understand from the submitted drawings that it contains the following amenities:

- Level 01 – Residential Amenity - 165.5sqm
- Level 02 – Podium Garden
- Level 18 – Communal Terrace

6.18 It is noted that the proposed development comprises some residential amenities at Level 01; however, the details of the amenities are not available, and it is not considered to be an extensive level of amenities, which would warrant a significant amount of additional operational expenses.

6.19 Whilst OPEX costs can be accounted for as a proportion of a scheme's rental income, the level of OPEX that a scheme incurs may not necessarily rise linearly as rent increases.

6.20 Having cross-checked the % of OPEX in monetary terms and having regard to the other BTR schemes reported by CJ, it is considered that an allowance of £6,750 per unit, which is equivalent to 20%, would be appropriate. We have adopted this in our appraisal. If the Applicant disagrees and considers that different assumptions should be made, they should provide evidence to demonstrate that an OPEX exceeding £8,000 per unit per annum is required for this development.

#### Residential: BTR Investment Yield

6.21 DS2 adopted a yield of 4.15% for the BTR component. It is stated that there is an absence of directly comparable transaction evidence to inform the yield assumption. They referenced the Residential Investment Yield Sheets from CBRE and Knight Frank.

6.22 CJ adopted the same yield and commented that it broadly reflects the current market expectations, taking into account the delivery structure proposed.

6.23 Given the site's well-connected Zone 3 location and high-quality amenities, these factors support a prime yield.

6.24 As one of the final developments to be delivered within the wider Ashley Road South regeneration area, the Berol Quarter benefits from the established success of neighbouring schemes, many of which are already well-occupied. This proven market performance reduces perceived investment risk, enabling investors to accept lower yield thresholds, thereby supporting higher capital values for the scheme.

6.25 In conclusion, GLAVT considers a 4.15% yield is not unreasonable for this location.

- 6.26 It is noted that CJ have tested lower yields as sensitivity testing, and commented that the reduction of interest rates means further yield compressions are possible in the future. This should be taken into account, as small changes to the investment yield could significantly affect the outputs.
- 6.27 The yield evidence the parties have relied on is based on net initial yields for stabilised assets. However, BTR developments are often delivered via a forward-funded model.
- 6.28 To further sense check the output of the FVA appraisal and the deliverability of the scheme, the GLAVT have produced a forward funding scenario appraisal based on a weaker yield (by 50 basis points – 4.65%) to cross-check the appraisal outputs based on the stabilised approach.

#### Interim income

- 6.29 DS2 did not assume any income from the BTR component during the letting period leading up to stabilisation.
- 6.30 CJ have assumed an income allowance of £1,747,788 to reflect the four-month interim income based on the stabilisation period assumed.
- 6.31 CJ's approach is considered reasonable in reflecting the additional income leading up to stabilisation. GLA officers have profiled the income based on the assumed letting rate across the four months, resulting in a lower income level of £1,184,661, which is included in our stabilised appraisal.
- 6.32 If the scheme is appraised based on a forward funding scenario, then this interim income should not be assumed, as the site's transaction would occur prior to or at completion.

#### Commercial Values

- 6.33 Both Berol Yard (BTR tower) and Berol House (office building) contain non-residential uses:

Site	Use	Floorspace NIA (sq ft)
Berol Yard	Retail	6,487 sqft
	Cultural	1,724 sqft
Berol House	Office	40,009 sqft
	Retail	4,844 sqft

#### Retail

- 6.34 The proposed scheme includes 11,331 sq ft (NIA) of retail space, split between 4,844 sq ft at Berol House and 6,487sq ft at Berol Yard.
- 6.35 DS2 adopted a rent of £30psf based on the four comparable letting evidence within the local areas in Tottenham and Walthamstow.
- 6.36 CJ have adopted the same rental allowance in their appraisal.

- 6.37 The GLAVT consider this to be an appropriate rental assumption.
- 6.38 In terms of investment yield, the Applicant has referenced two reports produced by Knight Frank and CBRE on high street retail conditions, with a range of prime yields between 6.5 and 6.75%. In addition, the same reports refer to Good Secondary yields at 10% and 9% respectively.
- 6.39 The Applicant has adopted a yield of 7% for retail use and has been advised that the proposed retail space is located on the ground floor and mezzanine within a comprehensive mixed-use development. However, upon review of the proposed drawings, it is noted that the mezzanine level does not contain any retail floorspace, and all the retail areas are on the ground floor.
- 6.40 CJ have also adopted a 7% yield in their appraisal.
- 6.41 Given the site location and its close proximity to Tottenham Hale rail and underground station, it is considered that the proposed retail units would attract good levels of footfall and investment. It is therefore considered that the 7% yield adopted is likely to be at the higher end of the range of yields which can be achieved in this location. We have adopted the same yield assumption in our appraisal.

#### Office

- 6.42 The proposed development includes 40,009 sq ft (NIA) of office space. The Applicant has adopted a total annual rent of £1,000,000, which is equivalent to £25 per sq ft.
- 6.43 CJ have reviewed the FVA and adopted a higher rental assumption at £27.50psf. The following comparable evidence was referenced:
- Stamford Works N16 – ranged from £25.23psf to £29.16psf
  - Parkhaus E5 – £29.82psf
  - Andre Street E8 - £21.29psf
  - Bonsoir House N16 - £20.15psf
- 6.44 It is noted that the comparables above vary in terms of quality and location (i.e., proximity to high street locations). CJ commented that the proposed commercial units would be superior to the comparable units above due to their new-build or refurbished quality. They also benefited from enhanced placemaking (as we commented on the BTR value section above), footfall, and long-term appeal. They also commented on the site's strong connectivity with the Tottenham Hale rail and underground station and the emerging residential clusters within the masterplan development.
- 6.45 Overall, it is considered that the rent adopted £27.50psf by CJ is more reasonable and even that is slightly conservative. We have adopted this in our appraisal.
- 6.46 In terms of the office yield, DS2 have referenced Knight Frank's Investment Yield Guide (February 2025), which reports yields for office major regional cities (10 years) are 6.5% (5 years are 7.5%). Knight Frank's Investment Yield Guide (May 2025) shows London City Prime at 5.25% to 5.5%.
- 6.47 The Applicant has also referenced CBRE's Property investment yields (February 2025), which present yields for regional cities of 6.5% and 5.75% for the City of London.

- 6.48 The GLAVT has checked these yields against Savills UK Commercial – Market in minutes June 2025, which shows Provincial offices at 6.75% and City offices at 5.25% for prime equivalent yields.
- 6.49 DS2 have adopted a yield of 6%, noting that the site is in a non-central London location. CJ also adopted the same yield in their appraisal.
- 6.50 The GLAVT finds this assumption to be reasonable.
- 6.51 The Applicant has assumed a 12-month rent-free period and a six-month void. The commercial element is assumed to capitalise upon the expiry of the void period.

#### Cultural

- 6.52 The proposed development includes a total of 1,724 sq ft (NIA) cultural space. The Applicant's FVA assumed letting the cultural space at 80% of retail market space, equating to £24 per sq ft and 3 year rent period is adopted. The rent-free period is understood to be included in the terms of the S106 agreement.
- 6.53 It is unclear whether this approach is supported by planning policy and the Council as a provision of affordable workspace. The Council should confirm whether this is supported in planning terms and whether the rental discount and the rent-free period (i.e. unit to be let at peppercorn rate for a fixed period of time) would be secured by the s106 agreement.

#### Purchaser's costs

- 6.54 DS2 have adopted an allowance of 6.80% for both residential and commercial elements for purchasers' costs.
- 6.55 CJ assumed 6.8% in their appraisal but have also tested a reduced purchase's cost at 3% to reflect potential savings on SDLT through usage of Special Purpose Vehicles to facilitate the BTR transactions. Given this can result in savings of SDLT, it would be reasonable to assume that the developers would opt for this in order to be tax efficient.
- 6.56 Therefore, we consider that a 3% allowance would be more reasonable for the BTR component and 6.8% for the commercial. We have adopted these assumptions in our appraisal.

### **Development Costs**

#### Construction costs

- 6.57 The construction costs for the proposed scheme have been advised by the Applicant's cost consultant, Calfordseaden.
- 6.58 The Calfordseaden cost plan dated February 2025 is included as an appendix to the Berol Yard FVA report and sets out a total construction cost of £92,587,0468 exclusive of contingency, reflecting a cost per sq. ft of £280.14 on the proposed scheme's total GIA. This is split as £74,608,800 for 2 Berol Yard and £16,978,668 for Berol House.

6.59 CJ instructed Johnson Associates to review the FVA cost plan, and they concluded that the following costs to be reasonable for the proposed development:

- Berol Yard: £71,007,274 (reduction of £1,224,263)
- Berol House: £15,778,960 (reduction of £703,183)
- Total: £86,786,234 (average £265.44psf)

6.60 GLAVT has adopted the same construction costs suggested by Johnson Associate in their review of the Applicant's build cost.

#### Professional fees

6.61 Professional fees of 10% of the total construction costs have been adopted in the FVA.

6.62 CJ have adopted a lower allowance of 8% and advised that professional fees typically range from 8-10% of build costs, depending on the complexity of the proposals. They further commented that on a scheme of this scale and characteristics, and in the absence of a detailed breakdown, a reduced 8% allowance was adopted in their appraisal.

6.63 It is considered that a professional fees allowance of 10% of total construction costs is generally reasonable for the proposed scheme, and such an assumption is in line with professional fee allowances adopted in appraisals of similar schemes reviewed by the GLA Viability Team, given the programme assumptions and retrofit of the locally listed building. However, with regard to the CJ's comments and the fact that the FVA is showing a significantly unviable scheme (with no affordable housing), it would be reasonable to test the outturn of the appraisal at 8%.

6.64 We have adopted a 10% allowance in our appraisal, but we reserve the opportunity to review our position once the Applicant provides further information.

#### Finance

6.65 A debit rate of 7% has been adopted in the FVA. This is an all-in rate, includes the basic margin (4-5%), commitment fees, arrangement fees (2-3%) and exit fees (0.5-1%) as well as a bank management/monitoring costs.

6.66 CJ have also adopted the same rate. This is equivalent to 10.4% of the total costs.

6.67 Whilst the 7% rate is not considered to be exceedingly high, it is considered that a debit rate of 6.5% would be more in line with comparable schemes referred to the Mayor, particularly it is noted that the BoE base rate has been reduced by 50 basis point since April 2025 (from 4.5% to 4%) and further reductions are likely.

6.68 As mentioned above, the scheme should also be tested in a forward funded basis to sense check the level of finance costs required for the proposal.

#### Community Infrastructure Levy and Financial Section 106 Planning Obligations

- 6.69 The FVA includes £2,702,822 of LB Haringey CIL and £1,772,914 of MCIL2 as development costs in the appraisal.
- 6.70 In addition, the FVA includes £2,648,750 of financial S106 contributions.
- 6.71 The CIL liability and total financial S106 contributions should be checked and verified by the LPA.
- 6.72 It would be useful to understand the increase in CIL liability from the extant 35% scheme to the proposed 0% scheme, as the increase in CIL rate (due to the increase in the number of market units) is circular and negatively affects the viability of the scheme and provision of affordable housing.

#### Marketing, letting and disposal fees

- 6.73 The following table sets out the marketing, letting and disposal fee allowances adopted in the FVA:

<b>Commercial Marketing Fees</b>	£1.50 per sq ft (of commercial NIA)
<b>Residential: BTR Marketing Fees</b>	1% of GDV (£1,222,699)
<b>Letting Agent Fees - Commercial</b>	10% of annual rent (of 1 <sup>st</sup> year's annual rental income)
<b>Letting Legal Fees - Commercial</b>	5% of annual rent (of 1 <sup>st</sup> year's annual rental income)
<b>Sales Agent Fee (BTR)</b>	0.5% (of BTR NDV)
<b>Commercial: Sales Agent Fees</b>	1% of Commercial NDV
<b>Commercial: Sales Legal Fees</b>	0.5% of Commercial NDV
<b>Sales Legal Fee (BTR)</b>	0.25% (of BTR NDV)

- 6.74 CJ have agreed with most of the assumptions above except the BTR marketing costs. The marketing of the BTR units is typically reflected as a revenue expense during the operational phase of the development. This is agreed by GLA officers and we have also excluded BTR marketing costs in our appraisal.

#### Profit

- 6.75 The profit allowances adopted by DS2 in their FVA are set out in the table below:

<b>Type of Development</b>	<b>Percentage of GDV</b>
	<b>FVA</b>
Market Housing	12.5%
Commercial	15%
Cultural	15%

- 6.76 It is considered that the developer's profit for market housing should be no greater than 12.5% of market housing GDV for BTR.

- 6.77 With respect to the proposed commercial element, it is considered that the adopted developer's profit of 15% on commercial GDV is a reasonable assumption.
- 6.78 It is questioned whether the cultural spaces would require the same target profit rate as the commercial units. Neither DS2 nor CJ have provided commentary on this, and it should be clarified.

#### Development Programme

- 6.79 The FVA has assumed a 12-month pre-construction period to prepare the site for development. The 'lead-in' period includes a three-month allowance for gateway 2 and a nine-month allowance for:
- Signing of s106 agreement (GLA comments: this is normally signed before the determination of the application)
  - Vacant possession of the site
  - Expiration of the Judicial Review period
  - Discharge of pre-commencement conditions
  - Main contractor procurement
  - Tender period for building contract packages and
  - Securing development funding.
- 6.80 A 40-month construction programme for Berol Yard, as advised by the Applicant, and an 18-month construction programme for Berol House.
- 6.81 CJ adopted the same development programme but requested further information on the Berol Yard construction period.
- 6.82 Similar to CJ, we request that the Applicant should provide further details on the length of programme, particularly regarding the construction period for the Berol Yard block. We have adopted the FVA's programme in our appraisal, but we reserve the right to review this once further information have been provided.
- 6.83 The Gateway 3 period is assumed to be 14 weeks and coincides with the BTR let-up period.
- 6.84 As outlined previously in this report, it is considered that an assumption of a letting rate of 60 units per month post-practical completion would be reasonable for the proposed scheme.

## 7. Benchmark Land Value

- 7.1 The FVA adopts £10,971,043 Benchmark Land Value ('BLV') for the subject site and compares this against the residual land value generated by the proposed scheme to ascertain viability. This is established using the Existing Use Value ('EUUV') approach, and it has been compared against the Residual Land Value ('RLV') generated by the proposed scheme to ascertain the viability position.
- 7.2 CJ adopted a lower BLV at £7,936,500.
- 7.3 As set out in section 2 above, the proposed amendments under this application are based on the original approval in March 2025, which is the same development that includes 35% affordable housing. The scope of this s73 application is to assess the difference between the approved development and the latest proposal without compliance with the conditions attached the original development, therefore, it would be appropriate to assess the Benchmark Land Value of the site based on the extant consent, which is the development approved under HGY/2023/0261, on the basis of an Alternative Use Value.
- 7.4 Notwithstanding the above, we have reviewed the EUV assessments carried out by DS2.

### EUV assessment - office

- 7.5 The site comprises Berol house, which is an existing office building comprising 27,900 sq. ft NIA. According to the FVA, the building is currently let to 82%. The existing tenancy is unknown (appendix 5 of the FVA was not included in the document that we received), but DS2 reported that the passing rent is £438,399 per annum. This produces an average existing income of £15.71psf.
- 7.6 DS2 have provided a number of office letting comparable which ranges from £15.00-£39.50psf. DS2 commented that most of the evidence are historic and there are little comparable evidence in the last 24 months. GLA officers agree with this observation based on our own research.
- 7.7 DS2 are of the opinion that the rents at the subject site would be higher than Champness Close (2,530 sqft, £15psf) as it was let in shell and core. It is worth noting that Champness Close is substantially smaller than the subject site in size. In fact, most of the comparable evidence is significantly smaller than the subject site (27,900sqft). One of the sites on Oxford Road (N4) is relatively large (16,619sqft) but is a new office and not considered to be directly comparable to the existing building on the subject site.
- 7.8 DS2 also noted that a unit at the subject property was let at £19.50psf and therefore assumed this rate can be achieved across the whole building based on its existing condition, on a five-year lease basis.
- 7.9 In terms of investment yield, six properties were referenced with transactions dated in 2022-23 at sale prices range from £1.75m - £9.15m. On an average £psf, the evidence range from £289psf - £540psf. There is no commentary provided in the FVA on whether the transacted sites have any scope for redevelopment or refurbishment which would not reflect the EUV of the site.

- 7.10 DS2 adopted a term (unexpired 2.9 years) and reversion yield at 6.5% and 6.75% respectively. This produces a net value of c.£7.85m and an average value of £281psf.
- 7.11 CJ agreed with the level of rents at £19.50psf but considered that the adopted yields at 6.5% and 6.75% appear overly optimistic given the asset's dated condition, lease profile and physical limitations. They advised a yield (also term and reversion) at 7.0% and 7.5% would be more appropriate.

#### EUV assessment - Open storage

- 7.12 For the Berol Yard site, DS2 have assumed that it can be used as an open storage.
- 7.13 DS2 have referenced a number of open storage asking and achieved rents comparable, which range from £4.29-£14.00 psf.
- 7.14 DS2 adopted a rent of £6.50psf and applied this rate across the whole site, assuming it is 100% lettable.
- 7.15 In terms of investment yield, DS2 referenced the Carter Jonas report in 2024, showing prime yields of 5.4% for London. They quoted Knight Frank's investment yield guide, which advises prime distribution/warehousing at 5.50% and secondary distribution at 6.00%. They also referenced CBRE's yields for Prime Distribution at 5.25% and Good Secondary at 6.50%.
- 7.16 DS2 adopted a yield of 6.5% for the open storage. After deducting purchasers' costs and letting/agent fees, it produces a value of c.£1,295m, reflecting a £4.017m per acre.
- 7.17 CJ, in their FVA review, agreed with DS2's rental assumption but considered that the yield adopted at 6.5% is too low. They have adopted a 7% yield to reflect the site's profile due to its small and constrained nature which does not offer the flexibility to prospect tenants.

#### Premium

- 7.18 DS2 have adopted a 20% landowner premium.
- 7.19 DS2 stated that their adoption of a 20% premium is based on Berol House currently let with 82% and that the site is located at proximity to Tottenham Hale station with good public transport accessibility.
- 7.20 CJ have reviewed the FVA and commented that whilst the existing Berol House building is let at 82% and is generating income, the property itself is ageing and may require ongoing investment. CJ considered that a 10% premium is more appropriate in this particular case.

#### Land transactions

- 7.21 No market evidence has been referenced by DS2 nor CJ to sense check their adopted Benchmark Land Value for the subject site.

Alternative Use Value

- 7.22 DS2 have not reported an Alternative Use Value (AUV) to support their adopted Benchmark Land Value for the subject site. They stated that the existing consent, which contains 35% affordable housing, would generate a lower revenue than the proposed scheme. As the latest scheme generates a negative land value, DS2 advised that the extant scheme would also generate a negative land value with a greater financial deficit, however, the extent of the deficit has not been specified in the FVA.
- 7.23 CJ have not tested the BLV of the site based on the Alternative Use Value and have not provide any comments on the extant scheme.

GLA comments on BLV

- 7.24 The GLA consider that the primary method to assess the Benchmark Land Value for this section 73 application should be based on the site's Alternative Use Value, due to the fact that the latest proposal would not have been submitted without the extant consent and that the assessment of this s73 application is primarily to assess the changes made from the extant consent, which in this case, the main change is the reduction of the proposed affordable housing from 35% to 0%.
- 7.25 Notwithstanding the comments above and on a without prejudice basis, GLA officers have reviewed the EUV calculations provided by DS2 and also the FVA review carried out by CJ:

- Berol House
  - For the reversionary valuation, DS2 adopted an average rental value of £19.50psf for the existing office building, assuming full occupation.
  - It is worth noting that DS2 have adopted a rate of £25psf for the proposed refurbished building, which is expected to meet the latest planning and building regulations and guidance. (We are adopting £27.50psf in line with CJ's review.)
  - It is noted that most of the comparable EUV office evidence are either newly built or converted, it is considered that they are likely to be superior to the subject site building in terms of location and quality. As mentioned above, the comparable evidence are all significantly smaller than the subject site.
  - Therefore, GLA officers are of the opinion that a lower rental value at £17.50psf should be adopted for the subject site on the basis of 100% occupation.
  - In terms of investment yield, due to the lack of direct comparables, we agree with CJ's comments on the building's existing conditions and limitations and therefore, the term and reversion yields at 7.0% and 7.5% are considered to be more reflective of the existing building.
- Berol Yard
  - It is important for the LPA to confirm whether the site in its current form and use, can be lawfully occupied as a separate open storage (i.e. that the use of the site as open storage would not result in a material change of use of the site, and therefore does not require planning permission for the use and the associated operation).
  - The committee report for the extant scheme stated that the last use of the Berol Yard was a construction compound for adjacent developments, and therefore, it

- does not appear to be used as an open storage as an individual planning unit, separate from the uses of the surrounding sites, which are subject to redevelopment and construction works.
- The LPA should also consider whether Berol Yard constitutes a separate planning unit for the operation as an open storage (i.e. whether Berol Yard can be operated as an open storage as an independent planning unit, with its own established access and facilities that comply with relevant planning policies).
  - If the open storage use requires planning permission, the LPA should confirm whether they are likely to be granted planning permission, taking into account the masterplan and the transition of the area, as well as any environmental and amenity considerations in regard to the surrounding occupiers.
  - No commentary was provided in the FVA on whether any of the comparable sites are subject to redevelopment, and the quality of the comparable sites (e.g. servicing, access, facilities, utilities) has not been commented on. It is noted that a number of sites in Wembley are located in an established industrial area, which is superior to the subject site. Therefore, we question whether the evidence provided is directly comparable to the nature of the subject site and further commentary/analysis is required to support the rental value adopted at £6.50psf for the subject site in its existing form and condition.
  - It is not considered that this section of the subject site warrants a premium as there is no evidence which suggests that the site is currently income generating, and in its current state and conditions, provides any incentive to the landowners to retain the site rather than releasing it for redevelopment. In the extant consent, the Applicant sought planning permission for the redevelopment of the site with 35% of affordable housing, which was the policy-compliant position. This indicates that the landowner was willing to release the site to comply with planning policies up until the planning permission was granted in March 2025.

#### Benchmark Land Value conclusion

- 7.26 As set out above, GLA officers consider that the Benchmark Land Value for this s73 application should be based on the extant consent.
- 7.27 The lawful use and the policy compliant position of the site, particularly Berol Yard, would need to be clarified by the LPA prior to the confirmation of the site's BLV.
- 7.28 Notwithstanding the above and on a without prejudice basis, GLA officers consider that the EUV of the site should be:

	<b>Berol House</b>	<b>Berol Yard (NB subject to further confirmation)</b>
EUV	Rent: £438,399p.a. (Term) and £17.5psf (Reversion)  Yield: 7% (Term) and 7.5% (Reversion)  Letting fee: 15%  Rent free/void: 18 months  <b>£5,769,434 (£207psf)</b>	Rent: £6.50psf  Yield: 7%  Letting fee: 15%  <b>£1,290,576 (c.£4m per acre)</b>

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Purchasers' costs	6.8%	
Premium	10%	0%
<b>EUV+</b>	<b>£7,117,639</b>	

- 7.29 Therefore, it is considered that the site benchmark should not exceed £7,117,639 even if the site's BLV is based on the EUV+.

## 8. Appraisal Results and Sensitivity Analysis

### Appraisal Results

- 8.1 DS2's appraisal adopts profit as a fixed input, producing a Residual Land Value which is then compared to their adopted Benchmark Land Value.
- 8.2 DS2's FVA concludes that the proposed scheme generates a residual land value of - £12,747,164. This is lower than DS2's £10,971,043 Benchmark Land Value, resulting in a deficit of £23,718,207.
- 8.3 CJ's appraisal adopts the same approach and produces a residual land value of - £169,556 based on 6.8% of purchaser's costs for the proposed BTR block. This is lower than their benchmark land value at £7,936,500, resulting in a deficit of £8,106,056.
- 8.4 On this basis, both DS2 and CJ concluded that the proposed scheme with no affordable housing is financially unviable.
- 8.5 GLA officers have tested both stabilised and forward funding scenario and both appraisals are showing that the scheme would produce a residual land value of £8,198,450 (stabilised) and £10,404,405 (forward fund). When compared to the Benchmark Land Value (subject to further confirmation) of £7,117,639 (based on EUV+), the scheme is viable with a small surplus at £1,080,811 and £3,286,766 respectively.
- 8.6 On this basis, even if the site's BLV is to be based on the Existing Use Value plus a premium, the scheme at 0% affordable housing does not provide the maximum viable amount of affordable housing.

### Sensitivity Analysis

- 8.7 The RICS' Financial viability in planning: conduct and reporting Professional Statement at section 2.9 states that all FVA and reviews must undertake sensitivity analysis. This can take the form of testing changes in build costs and GDV and/or testing different inputs.
- 8.8 Schemes coming forward for development are expected to be capable of fully complying with planning policy requirements whilst also generating sufficient developer and landowner returns to allow for delivery to occur.
- 8.9 Paragraph 3.10 of the Mayor's Affordable Housing and Viability SPG requires applicants to demonstrate that their proposal is deliverable and that their approach to viability is realistic.
- 8.10 Appraisals testing both the proposed level of affordable housing and a policy-compliant level of affordable housing (such as the extant scheme) should be provided alongside sensitivity testing for both appraisals.
- 8.11 The FVA includes sensitivity analysis showing changes to build costs against investment yields and BTR Rents. It shows that the scheme would remain in deficit unless the build costs reduce by at least 5%.

- 8.12 CJ have tested changes to market rent and construction costs, as well as changes to yield assumptions for the BTR component. They have also tested 3% allowance for purchaser's costs and as per the above section of the report, we considered this to be appropriate and have adopted in our appraisal.

## 9. Sense Checking Exercise

- 9.1 Residual valuations are sensitive to changes in value and cost assumptions. The RICS' Financial viability in planning: conduct and reporting Professional Statement requires that Chartered Surveyors undertake a "Stand back" sense checking exercise.
- 9.2 If the proposed level of affordable housing shows a deficit position, the Applicant is required to demonstrate how the scheme is deliverable, in accordance with paragraph 3.10 of the Mayor of London's Affordable Housing and Viability SPG.
- 9.3 This is particularly important in this case, as the proposal with no affordable housing is still expected to result in a deficit. This either suggests that the scheme is not deliverable, or the methodology of the viability assessment does not reflect the realistic assumptions that a typical developer would make to ensure that the proposed development, regardless of the level of affordable housing, is viable and deliverable. Otherwise, it begs the question of whether the proposal (which the Applicant stated as unviable as part of the application) can contribute to the Borough's housing supply, as the development is, according to the FVA, not viable to be brought forward.

### Rental Growth and Cost Inflation

- 9.4 The FVA is carried out on a current-day basis, assuming no rental growth and cost inflation throughout the development period. Due to the deficit position identified in the FVA and the issues highlighted above, GLA officers consider that further viability testing should be carried out to consider the impact of rental growth and cost inflation. Whilst it is noted that testing growth and inflation would result in additional uncertainty as growth may or may not materialise, however, due to the output set out in the FVA, it will help provide an additional sense check to ensure that the value of the site reflects the position of an investor.

### Cross checking land transactions

- 9.5 The RICS Valuation of Development Property (2019) Professional Standard sets out that best practice avoids reliance on a single approach or method of assessing the value of development property. It advocates an approach where valuation undertaken by the market comparison approach should be cross-checked by reference to the residual method; and conversely, where a residual method is used, it is important to cross-check the residual land value output with comparable market bids and transactions.
- 9.6 In light of the above, and taking account of the recommendations outlined in this report, the Applicant should undertake a sense-checking exercise to ensure that their adopted appraisal input assumptions including profit are reasonable and the reported viability position is robust.

## 10. Review Mechanisms

- 10.1 The Section 106 Agreement, in accordance with the London Plan 2021, will need to include early and late stage review mechanisms. The mechanisms should use the formulas set out in the Mayor's Affordable Housing and Viability SPG.

## 11. Overall Comments and Recommended Next Steps

- 11.1 Based on the appraisal results set out in section 8 of this report. It is considered that the project could provide additional affordable housing beyond the proposed level, which is zero.
- 11.2 An updated FVA which accounts for the comments set out in this document should be produced to identify the maximum viable amount of affordable housing.
- 11.3 The GLA will reassess the proposed scheme once the further information requested in this document has been provided.

## 12. Author Sign Off

- 12.1 The author(s) of this report confirm that:
- In preparing this report, they have acted with objectivity, impartiality, without interference, and with reference to all appropriate sources of information.
  - They are not aware of any conflicts of interest in relation to this report.
  - In preparing this report, no performance-related or contingent fees have been agreed upon.
  - This report has been prepared on the basis that it can be made publicly available.
  - They are not providing ongoing advice in relation to an area-wide financial viability assessment.
  - Where this report relies on external contributions who have been instructed directly by the GLA, the contributors have been considered competent and understand that they must comply with the mandatory requirements of the relevant professional guidance. Where this report relies on external contributions who have not been instructed directly by the GLA (such as in relation to build cost advice) the GLA expects the instructing organisation to ensure the party appointed is aware of relevant requirements.
  - Adequate time was taken to produce this report, proportionate to the scale and complexity of the planning application.

<b>Author</b>
David Nip MRICS Date: 14/08/2025

**Appendix A: Site Location Plan**



*Source: Site Location, Prepared by DS2 LLP*

**Appendix B: Existing Site**



Source: Google Maps (2023)



Source: Google Maps (2023)

**Appendix C: Renderings of proposed scheme**



Source: Applicant/Allies and Morrison



Source: Applicant / Applicant/Allies and Morrison

25 September 2025

David Price  
Associate Partner  
Carter Jonas

*By email only*

Dear David

**BEROL YARD, LONDON BOROUGH OF HARINGEY – FINANCIAL VIABILITY, RESPONSE TO CARTER JONAS INDEPENDENT VIABILITY REVIEW REPORT, JUNE 2025 AND GLA VIABILITY TEAM REVIEW, AUGUST 2025**

**Introduction**

We write in relation to the Carter Jonas review dated June 2025 of the Financial Viability Assessment (“FVA”) dated April 2025, prepared on behalf of the Applicant (Berol Quarter Limited) (hereafter “the Applicant”) in relation to a Section 73 planning application for Berol Quarter, N17 within the London Borough of Haringey. The project seeks to deliver 210 new homes and ancillary commercial and community uses (“the Proposed Scheme”). The Site benefits from Planning Permission (HGY/2023/0261) that was granted on 3rd March 2025. The subsequent Section 73 application removes the affordable housing given the significant current viability changes in light of the volatile economic and geopolitical environment.

The Carter Jonas report concludes that the provision of affordable housing at the current time is not viable albeit there is a difference of opinion in respect of the level of financial deficit.

This letter also responds to the GLA Viability Team review dated 14 August 2025. The GLA report concludes that there may be some financial surplus for affordable housing of between £1,080,811 and £3,286,766 dependent on the delivery mechanism.

**Summary of the Carter Jonas Review**

The Carter Jonas report concludes that the Proposed Scheme cannot viably deliver affordable housing and that there is a current day deficit of £8,106,056. The main areas of divergence are as follows:

- Inclusion of interim rent
- A reduction in construction costs
- Reduction in operating expenditure
- Adjustment in the purchaser’s costs to 3 percent



- Reduction in the professional fees budget to 8 percent
- Removal of BTR marketing budget
- Reduction in the Benchmark Land Value ('BLV') of c. £3 million

#### **Summary of GLA Viability Team Review**

The GLA Viability Team report reviews both DS2's report and the Carter Jonas response. The key matters of divergence over and above those identified by Carter Jonas can be summarised as follows:

- The GLAVT have added a 5 percent regeneration premium which increased the net operating income
- A reduction in the operation budget
- Introduction of scenarios reflecting different delivery scenarios
- Inclusion of interim income

We have sought to respond to both the BPS and GLA Viability Team comments within this response in order to consolidate the correspondence into a single document. Responses are included below.

Table One: Areas of Divergence – Berol Yard &amp; House FVA, September 2025

Input	Comments
<b>Benchmark Land Value ('BLV')</b>	
Carter Jonas comments	<p>Carter Jonas have discounted the yield from 6.5 percent for Berol House to 7 percent for the term and 7.5 percent for the reversion given the building's age, limited specification and fragmented occupancy.</p> <p>Carter Jonas have discounted the yield from 6.5 percent to 7 percent.</p> <p>In terms of the premium, Carter Jonas have applied a 10 percent premium given the constrained development economics and the viability constraints of a lack of affordable housing.</p> <p>Overall, the amendments result in a reduction in the BLV of £3,034,543.</p>
GLA comments	<p>The GLAVT comments refer to the BLV being the consented position rather than the existing use. This is incorrect, as per the PPG, the consent (an AUV) is an informative to the EUV plus approach.</p> <p>In terms of the yield and the premium, the GLAVT have adopted the Carter Jonas position.</p>
DS2 comments and updated position	<p>In terms of the yield, we are willing to accept the 50bps reduction as proposed by Carter Jonas. In respect of the reduction in premium from 20 percent to 10 percent, we note that BNPPRE in their report November 2017 report, adopted a 20 percent premium (subsequently increased to 30 percent) on the basis that the Site is income producing and has an allocation for development, and as such, in accordance with the PPG requirements a reasonable incentive is justifiable.</p> <p>We would also note that the Site includes a car parking area (as noted in the FVA) to service the tenants in Berol House during its pre-development phase. No value has been attributed for this element of the BLV.</p> <p>As such, the amended BLV is £8,658,000.</p>
<b>Operating Expenditure ('OPEX')</b>	
Carter Jonas comments	Carter Jonas notes that on a per unit basis, the 25 percent input equates to in excess of £8,000 per unit which is higher than the comps provided (a number of which relate to DS2 projects).
GLA comments	The GLA have adopted the Carter Jonas OPEX.
DS2 comments and updated position	<p>25 percent is commonly accepted, and we note that Grainger, the UK's largest residential landlord quotes on pg. six of their 2024 Annual Report that OPEX across their portfolio are 25 percent.</p> <p>However, on a without prejudice basis, the 22.5 percent OPEX budget has been accepted albeit on the basis that the BTR marketing budget is accepted (as explained below, this is an upfront cost that site outside the traditional OPEX).</p>
<b>Purchaser's Costs</b>	
Carter Jonas comments	Reduction in the costs to 3 percent rather than 6.8 percent. This assumes explicitly that an SPV will be used to facilitate the transaction of the completed asset.
GLA comments	The GLA have adopted the Carter Jonas Purchaser's Costs.
DS2 comments and updated position	As DS2 have noted consistently elsewhere, and as explained in the RICS Valuation guidance (Valuing residential property purpose built for renting, effective from October 2018), full purchaser's costs should be reflected as a standard (para 5.4.3 -representative of the market

	<p>rather than the position of an individual investor) assumption and the full costs would be reflected for an asset on a landowner's balance sheet.</p> <p>The key component regardless of the delivery structure is the assessment of the Gross Development Value and the deduction to a Net Operating Income ('NOI'). Notwithstanding that the majority of Forward Funding and Forward Commit (FF / FC) agreements are currently unviable given the softening of yields and increase in costs in recent years, a FF or FC structure is simply a procurement route to delivering an empty building.</p> <p>As such, we have retained the full Purchaser's Costs.</p>
<b>Interim Rent</b>	
Carter Jonas comments	Carter Jonas notes that further to a four-month stabilisation period, the NOI is capitalised (i.e. a sale of the asset takes place) but correctly also notes that there is no income for the first three months.
GLA comments	GLA makes the same observation.
DS2 comments and updated position	<p>The three-month period allows for Gateway Three sign off, at which time no occupation can take place, this is likely to be longer based on current experience with the Building Safety Regulator.</p> <p>In reality, the stabilisation of a new asset will take place over 1 to 2 years, however the upfront capitalisation benefits the appraisals. The market yield is a net yield for a stabilised (i.e. fully let) asset. We would also note that recent lettings in similar buildings, The Sessile next door for example, required significant incentives (including rent-free periods) to secure lettings and these are not included in our pricing.</p> <p>As such, we have not included any additional income.</p>
<b>Commercial Property Income</b>	
Carter Jonas comments	Carter Jonas have increased the rent for the commercial space from £25 psf to £27.50 psf to reflect the 'specification and positioning of the proposed space' which has increased the overall value by c. £1.6m.
GLA comments	Largely in line with Carter Jonas' comments.
DS2 comments and updated position	<p>The construction costs for the commercial space assume CAT A and the latest rental of the 14,500sqft Class E commercial unit at The Gessner has been let at £14.50 psf for shell and core, plus 18 months' rent free.</p> <p>Increasing the rent beyond £25 is not reflective of the current market conditions and as such these are already optimistic based on The Gessner letting (further details of which, can be provided if required).</p>
<b>Construction Costs</b>	
Carter Jonas comments	The construction budgets have been scrutinised by Johnson Associates who have reduced Berol Yard by £1,224,263 and Berol House by £703,183.
GLA comments	Adopted Carter Jonas lower costs.
DS2 comments and updated position	A reduction in the construction costs is not compatible with the rental allowances. The Gessner and The Sessile are both relied on as the rental indicators, however both of these buildings were delivered by the Applicant and the construction allowances were significantly more than those proposed by Johnson Associates. For example, the rents in The Gessner and The Sessile are based on part-furnished apartments, but there are no such allowances in the construction cost plan. Similarly, The Gessner and The Sessile have enhanced public amenity areas, with no such allowances made within the construction cost plan. Finally, given the height and complexity of constructing a tower above a London Underground Tube Line and compliance with the Building Safety Act, construction costs will only rise.

	However, given this is a relatively small reduction and within a reasonable margin of tolerance, these figures have been included on a without prejudice basis
<b>Professional Fees</b>	
Carter Jonas comments	Carter Jonas have reduced the professional fees budget to 8 percent citing a lack of a detailed breakdown.
GLA comments	The GLA have accepted 10 percent as an industry norm.
DS2 comments and updated position	<p>DS2 would note that 10 percent is the normal objective allowance and includes a range of costs that are commonly excluded from the viability process (project insurances, warranties etc). We can't recall ever accepting less than 10 percent and we have not had to provide a detailed breakdown in adopting 10 percent elsewhere (indeed, working collaboratively with Carter Jonas elsewhere).</p> <p>We would also now note that the fees budget allows for additional costs related to the Building Safety Act requirements.</p> <p>We have retained the 10 percent budget as an objective industry norm.</p>
<b>BTR Marketing Fee</b>	
Carter Jonas comments	This has been excluded as an operating expense i.e. within the OPEX budget.
GLA comments	Adopted Carter Jonas position.
DS2 comments and updated position	<p>DS2 have commonly had BTR marketing costs included as a standalone cost outside the OPEX as this is an upfront cost that sits outside the normal OPEX. In reality, there are broader 'launch' costs that are significantly higher than 1 percent of the GDV, which are not included here and would be included within the budget from the BTR operator as a one-off cost. This is particularly relevant given there is no stabilisation period allowed within the FVA.</p> <p>We have retained the 1 percent budget.</p>
<b>Development Programme</b>	
Carter Jonas comments	Carter Jonas have requested a more detailed breakdown for the Berol Yard construction timeline.
GLA comments	Have also requested additional information on the construction programme.
DS2 comments and updated position	The construction programme is based on the information provided during the original planning application process and the Construction Logistics Plan. The 40-month programme excludes the 12-week Gateway 3 approval process and is based on a start on site date (i.e. excluding lead-in time).
<b>Community Infrastructure Levy</b>	
Carter Jonas comments	Carter Jonas accepts the figures subject to further verification.
GLA comments	As above.
DS2 comments and updated position	<p>We have been provided with an updated CIL notice by planning consultants' Lichfields published by the London Borough of Haringey dated 4 March related to the consented scheme.</p> <p>Given the time passed and the reduction in affordable housing, the overall liability will likely be higher, and the figures can be updated in due course if required. The FVA is based on the updated CIL notice from the London Borough of Haringey.</p>



In addition to the Carter Jonas comments, the following inputs are also amended in the GLA response.

Table Two: Additional GLA Input Comments, Berol Yard, September 2025	
GLA Comment	DS2 Response
Gross Development Values – the GLA include at 6.12 of their report a 5 percent ‘regeneration premium’.	<p>This regeneration is already built into the existing rents and rents that have been agreed with Carter Jonas are reflective of the likes of The Gessner and The Sessile buildings (where we would note that the level of amenity provided is higher).</p> <p>The GLA report also notes at 6.18 that the lower OPEX costs (adjusted to 22.5 percent) are also partially as a result of there not being ‘considered to be an extensive level of amenities’.</p> <p>There is no justification, particularly in this market, for an arbitrary regeneration premium and the rents are already full (and we have not allowed for a 12-to-24-month stabilisation period).</p>
Adopt a 6.5 percent finance rate and make reference to further rate reductions being likely and reference to a Forward Fund scenario.	<p>The current outlook for the UK economy is extremely challenging and the autumn budget may well be pivotal for economic growth. The Bank of England, and indeed markets, have signalled that further rate reductions this year are now unlikely and current risk-free rates are historically high (for 5-, 10- and 30-year gilts). The existing base rate is 4 percent and therefore the GLA are only applying a 250-bps margin for development debt which not sufficient.</p>



The GLA report also requests further clarity I respect of the following overarching / methodological matters:

Table Three: Additional GLA Comments, Berol Yard, September 2025	
GLA Comment	DS2 Response
Explanation as to how the scheme with a significant deficit (as modelled in the FVA) can be delivered by the Applicant or another developer.	The project is constrained at the current time and the economics are a reflection of unprecedented cost inflation over the last 5 years, a softening of yields (as noted 10 yr risk free rates are currently at 4.66 percent) and new regulatory requirements. The majority of schemes, with planning, are not being delivered hence the current Section 73 application. There is a deficit but one that is not insurmountable with some level of rental growth and, at some risk, a compression in the NIY over the next few years.
Clarification on Delivery Model—The FVA does not confirm whether the BTR scheme will be sold or retained after completion. We request clarification on whether a forward funding model is being pursued and recommend an additional appraisal reflecting this scenario.	Planning viability is undertaken on an objective basis, that is the identity of the applicant is not pertinent to the outcome. The type of delivery vehicle is somewhat of a 'red herring' as previously explained to the GLA. A FF or FC is simply a procurement vehicle and the key components, the development costs and the GDV which derives an Net Operating Income which is capitalised by a stabilised (operational) yield, are the same. In reality at the current time, the FF /FC model is largely impaired and there needs to be an improvement in yields for many schemes to come forward.
As above, a sense-checking exercise should cross-check the viability assessment's outcome and ensure its robustness.	DS2 have previously set out significant concerns regarding sense checking in respect of using land evidence as comparator for the viability process – one if the best evidence in the market (often opaque in nature as the RICS Valuation of Development Land Professional Standard warns) and the other is an objective viability exercise using a series of market norms. We would also note that at the current time there really is no market evidence in terms of land transactions in any event.
Cultural space – the FVA assume the cultural space to be let at 80% of retail market space with a 3-year rent free period. The Council should confirm whether this is supported in planning terms and whether the rental discount and the rent-free period would be secured by the S106 agreement.	This has been documented in the signed Section 106 Agreement for the extant permission.
CIL and S106 Contributions – we request verification of the CIL liability and S106 contributions.	The S106 liabilities are documented in the signed Section 106 Agreement for the extant permission. As noted above, Lichfields have provided an updated CIL estimate.
Development Programme – We seek further clarification on the 40-month construction period for the BTR block.	As above



## Summary

The purpose of this letter is to respond to the areas of differences between DS2, Carter Jones and the GLA Viability Team in order to collaboratively reach a reasonable agreement on the viability of the Proposed Scheme.

To summarise, the table above provides additional clarity in respect of the areas of divergence. The council's advisor Carter Jones and the Applicant are in agreement that the scheme cannot deliver affordable housing in the current market. This is not inconsistent with our experience of other projects elsewhere at the current time and this is borne out by a historic number of planning consents that are not being converted into starts.

Whilst all stakeholders recognise the strategic importance of affordable housing, where there is an acute shortage, the reality of the situation right now is that Section 106 which has historically been the key driver of affordable housing delivery in London, cannot largely support mixed tenure delivery in the capital. This is particularly pertinent for what might be referred to income pricing assets (such as BTR and PBSA) where investors are seeking a long income return commonly on an Internal Rate of Return and the current yield profile and risk-free options are barriers to delivery.

We would note, that given the application has been viability tested, any subsequent planning consent will be subject to review provisions which would capture any uplift in the economics for the council and potentially deliver an affordable housing outcome.

The table below summaries the revised viability position reflecting the changes identified in the table above.

Table Four: Updated Berol Yard Appraisal Results, September 2025			
	Target BLV	Residual Land Value	Deficit
Proposed Development	£8,658,000	Minus £6,342,947	Minus £15,000,947

As the table above illustrates, the deficit has been reduced from £23,718,207 to £15,000,947 having reviewed the Carter Jones and GLAVT comments. Having reviewed the comments, on a without prejudice basis, we have amended the appraisal to reflect the following changes:

- Reduction in the BLV through an amendment to the yields (albeit the 20 percent premium has been retained).
- Reduction in OPEX from 25 to 22.5 percent.
- Reduction in the construction cost budget.

We look forward to receiving any final comments in respect of the matter itemised above.

**DS2 LLP**

# Appendix 10 - Carter Jonas Rebuttal Response October 2025

## **BEROL QUARTER, N17 9LJ**

**Berol Quarter Response to DS2 Viability Response letter dated 25<sup>th</sup> September 2025**

Final

**SUBMITTED ON BEHALF OF CLIENT:**

LB Haringey

October 2025

**Introduction**

We have reviewed DS2's viability response document dated 25 September 2025 in relation to the proposed redevelopment of the Berol Quarter, N17. For ease of reference, our comments are set out in the right-hand column (in blue) in the tables below. Please note that our response addresses DS2's comments directed to Carter Jonas, rather than those addressed to the GLA.

Table One: Areas of Divergence – Berol Yard & House FVA, September 2025		
Input	Comments	Carter Jonas Comments - October 2025
<b>Benchmark Land Value ('BLV')</b>		
Carter Jonas comments	<p>Carter Jonas have discounted the yield from 6.5 percent for Berol House to 7 percent for the term and 7.5 percent for the reversion given the building's age, limited specification and fragmented occupancy.</p> <p>Carter Jonas have discounted the yield from 6.5 percent to 7 percent.</p> <p>In terms of the premium, Carter Jonas have applied a 10 percent premium given the constrained development economics and the viability constraints of a lack of affordable housing.</p> <p>Overall, the amendments result in a reduction in the BLV of £3,034,543.</p>	
GLA comments	<p>The GLAVT comments refer to the BLV being the consented position rather than the existing use. This is incorrect, as per the PPG, the consent (an AUV) is an informative to the EUV plus approach.</p> <p>In terms of the yield and the premium, the GLAVT have adopted the Carter Jonas position.</p>	
DS2 comments and updated position	<p>In terms of the yield, we are willing to accept the 50bps reduction as proposed by Carter Jonas. In respect of the reduction in premium from 20 percent to 10 percent, we note that BNPPRE in their report November 2017 report, adopted a 20 percent premium (subsequently increased to 30 percent) on the basis that the Site is income producing and has an allocation for development, and</p>	<p>DS2 originally attributed a BLV of £10,971,043. Applying our own yield profile assumptions reduces the overall EUV to £7,215,000. DS2 has accepted the 50bps reduction in the yield profile for the purpose of establishing the BLV.</p> <p>In relation to the premium, DS2 initially proposed 20%, compared to the 10% adopted by us. We acknowledge that the existing asset is income-</p>

	<p>as such, in accordance with the PPG requirements a reasonable incentive is justifiable.</p> <p>We would also note that the Site includes a car parking area (as noted in the FVA) to service the tenants in Berol House during its pre-development phase. No value has been attributed for this element of the BLV.</p> <p>As such, the amended BLV is £8,658,000.</p>	<p>producing, and DS2 has highlighted the previously accepted position on premium. However, on balance, and reflecting DS2's acceptance of our position in respect of EUV, we consider the application of a 20% premium reasonable in this instance.</p> <p>Accordingly, this results in a revised BLV of £8,658,000, representing a discount of £2,313,043 from DS2's original position.</p>
<b>Operating Expenditure ('OPEX')</b>		
Carter Jonas comments	Carter Jonas notes that on a per unit basis, the 25 percent input equates to in excess of £8,000 per unit which is higher than the comps provided (a number of which relate to DS2 projects).	
GLA comments	The GLA have adopted the Carter Jonas OPEX.	
DS2 comments and updated position	<p>25 percent is commonly accepted, and we note that Grainger, the UK's largest residential landlord quotes on pg. six of their 2024 Annual Report that OPEX across their portfolio are 25 percent.</p> <p>However, on a without prejudice basis, the 22.5 percent OPEX budget has been accepted albeit on the basis that the BTR marketing budget is accepted (as explained below, this is an upfront cost that site outside the traditional OPEX).</p>	We note DS2 acceptance of our 22.5% Opex (on a without Prejudice basis).
<b>Purchaser's Costs</b>		
Carter Jonas comments	Reduction in the costs to 3 percent rather than 6.8 percent. This assumes explicitly that an SPV will be used to facilitate the transaction of the completed asset.	
GLA comments	The GLA have adopted the Carter Jonas Purchaser's Costs.	

<p>DS2 comments and updated position</p>	<p>As DS2 have noted consistently elsewhere, and as explained in the RICS Valuation guidance (Valuing residential property purpose built for renting, effective from October 2018), full purchaser's costs should be reflected as a standard (para 5.4.3 - representative of the market rather than the position of an individual investor) assumption and the full costs would be reflected for an asset on a landowner's balance sheet.</p> <p>The key component regardless of the delivery structure is the assessment of the Gross Development Value and the deduction to a Net Operating Income ('NOI'). Notwithstanding that the majority of Forward Funding and Forward Commit (FF / FC) agreements are currently unviable given the softening of yields and increase in costs in recent years, a FF or FC structure is simply a procurement route to delivering an empty building.</p> <p>As such, we have retained the full Purchaser's Costs.</p>	<p>We note DS2's comments, and our position as set out within the FVA remains unchanged. Our base model reflected the same underlying assumptions as DS2; however, the reduction of stamp duty to 3% was applied by way of sensitivity analysis. We continue to consider this a helpful exercise in illustrating the impact of varying stamp duty assumptions.</p>
<p><b>Interim Rent</b></p>		
<p>Carter Jonas comments</p>	<p>Carter Jonas notes that further to a four-month stabilisation period, the NOI is capitalised (i.e. a sale of the asset takes place) but correctly also notes that there is no income for the first three months.</p>	
<p>GLA comments</p>	<p>GLA makes the same observation.</p>	
<p>DS2 comments and updated position</p>	<p>The three-month period allows for Gateway Three sign off, at which time no occupation can take place, this is likely to be longer based on current experience with the Building Safety Regulator.</p> <p>In reality, the stabilisation of a new asset will take place over 1 to 2 years, however the upfront capitalisation benefits the appraisals. The market yield is a net yield for a stabilised (i.e. fully let) asset. We would also note that recent lettings in similar buildings, The Sessile next door for example, required significant incentives</p>	<p>We note DS2's observations regarding the Gateway Three sign-off period, the stabilisation timeframe, and the associated leasing incentives required in comparable assets such as The Sessile. While we recognise that the market yield reflects a stabilised, fully-let position, we accept that in practice the stabilisation process can extend over a 1–2 year period and that material incentives are often required to secure lettings.</p>

	(including rent-free periods) to secure lettings and these are not included in our pricing.  As such, we have not included any additional income.	On balance, and reflecting the capitalisation approach adopted in the appraisals, we accept DS2's position not to include additional income in this instance.
<b>Commercial Property Income</b>		
Carter Jonas comments	Carter Jonas have increased the rent for the commercial space from £25 psf to £27.50 psf to reflect the 'specification and positioning of the proposed space' which has increased the overall value by c. £1.6m.	
GLA comments	Largely in line with Carter Jonas' comments.	
DS2 comments and updated position	The construction costs for the commercial space assume CAT A and the latest rental of the 14,500sqft Class E commercial unit at The Gessner has been let at £14.50 psf for shell and core, plus 18 months' rent free.  Increasing the rent beyond £25 is not reflective of the current market conditions and as such these are already optimistic based on The Gessner letting (further details of which, can be provided if required).	We do not consider that DS2 has provided any new or compelling information. While reference has been made to the Gessner Building letting, no supporting detail has been provided. Our review report already referred to the Applicant's own agent evidence, and we remain satisfied that our rental tone sits reasonably within the range of that evidence. Accordingly, we see no reason to alter our position at this stage.
<b>Construction Costs</b>		
Carter Jonas comments	The construction budgets have been scrutinised by Johnson Associates who have reduced Berol Yard by £1,224,263 and Berol House by £703,183.	
GLA comments	Adopted Carter Jonas lower costs.	
DS2 comments	A reduction in the construction costs is not compatible with the rental allowances. The Gessner and The Sessile are both relied	We note DS2 acceptance of our position (on a without Prejudice basis).

<p>and updated position</p>	<p>on as the rental indicators, however both of these buildings were delivered by the Applicant and the construction allowances were significantly more than those proposed by Johnson Associates. For example, the rents in The Gessner and The Sessile are based on part-furnished apartments, but there are no such allowances in the construction cost plan. Similarly, The Gessner and The Sessile have enhanced public amenity areas, with no such allowances made within the construction cost plan. Finally, given the height and complexity of constructing a tower above a London Underground Tube Line and compliance with the Building Safety Act, construction costs will only rise.</p> <p>However, given this is a relatively small reduction and within a reasonable margin of tolerance, these figures have been included on a without prejudice basis</p>	
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<b>Professional Fees</b>		
Carter Jonas comments	Carter Jonas have reduced the professional fees budget to 8 percent citing a lack of a detailed breakdown.	
GLA comments	The GLA have accepted 10 percent as an industry norm.	
DS2 comments and updated position	<p>DS2 would note that 10 percent is the normal objective allowance and includes a range of costs that are commonly excluded from the viability process (project insurances, warranties etc). We can't recall ever accepting less than 10 percent and we have not had to provide a detailed breakdown in adopting 10 percent elsewhere (indeed, working collaboratively with Carter Jonas elsewhere).</p> <p>We would also now note that the fees budget allows for additional costs related to the Building Safety Act requirements.</p> <p>We have retained the 10 percent budget as an objective industry norm.</p>	<p>DS2 has retained their original assumption of 10%. We provided a schedule of 20 major BTR schemes and the corresponding professional fee allowances, which indicated a range of 7% to 10%. Given the scale of this scheme, we noted that a 10% allowance equates to capital costs of £9,158,747. No breakdown has been provided to justify this level of allowance, though we acknowledge the potential for additional costs arising from Building Safety Act requirements.</p> <p>For the purposes of our updated modelling, we have adopted a 9% allowance, representing the mid-point between our respective positions. This mirrors the compromise reached on major BTR proposals for the Broad Street Mall in Reading between Carter Jonas and DS2.</p>
<b>BTR Marketing Fee</b>		
Carter Jonas comments	This has been excluded as an operating expense i.e. within the OPEX budget.	
GLA comments	Adopted Carter Jonas position.	
DS2 comments and updated position	<p>DS2 have commonly had BTR marketing costs included as a standalone cost outside the OPEX as this is an upfront cost that sits outside the normal OPEX. In reality, there are broader 'launch' costs that are significantly higher than 1 percent of the GDV, which are not included here and would be included within the budget from the BTR operator as a one-off cost. This is</p>	<p>We note DS2's acceptance of a 22.5% Opex cost (on a without prejudice basis). However, we maintain that marketing costs should be considered within the Opex allowance. We recognise that some mobilisation costs have been reflected, typically ranging from £800-£1,000 per unit, but in our experience a separate allowance for marketing costs (outside of</p>

	<p>particularly relevant given there is no stabilisation period allowed within the FVA.</p> <p>We have retained the 1 percent budget.</p>	<p>Opex) is not common practice. We would welcome any examples DS2 can provide to support such an approach.</p> <p>For the avoidance of doubt, in our updated modelling we have continued to exclude the additional 1% marketing cost, while reflecting a £1,000 per unit start-up/mobilisation cost.</p>
<b>Development Programme</b>		
Carter Jonas comments	Carter Jonas have requested a more detailed breakdown for the Berol Yard construction timeline.	
GLA comments	Have also requested additional information on the construction programme.	
DS2 comments and updated position	The construction programme is based on the information provided during the original planning application process and the Construction Logistics Plan. The 40-month programme excludes the 12-week Gateway 3 approval process and is based on a start on site date (i.e. excluding lead-in time).	We mirrored DS2 assumptions for the purpose of our modelling and we acknowledge the additional information provided.
<b>Community Infrastructure Levy</b>		
Carter Jonas comments	Carter Jonas accepts the figures subject to further verification.	
GLA comments	As above.	
DS2 comments and updated position	<p>We have been provided with an updated CIL notice by planning consultants' Lichfields published by the London Borough of Haringey dated 4 March related to the consented scheme.</p> <p>Given the time passed and the reduction in affordable housing, the overall liability will likely be higher, and the figures can be updated in due course if required. The FVA is based on the updated CIL notice from the London Borough of Haringey.</p>	Noted – Needs validating and updating in due course.

## Updated Modelling – October 2025

A side-by-side summary of DS2 and our original and updated viability outputs are detailed in the table below: -

Proposed Development	DS2	Carter Jonas	DS2	Carter Jonas
	Original Position		Revised Position	
Total BLV	£10,971,043	£7,936,500	£8,658,000	£8,658,000
Residual Land value	-£12,747,164	-£169,556	-£6,342,947	-£2,537,531
Surplus Deficit	(£23,718,207)	(£8,106,056)	(£15,000,947)	(£11,195,531)*

\*on the assumption of a 3% stamp duty allowances the be a positive land value of £1,058,432 and a reduced project deficit of £7,599,568

### Overall Conclusions

Our overall conclusion remains unchanged from our original findings in that based on current costs and values, the proposed development faces viability challenges, as evidenced by the projected deficit. As highlighted in our review report, relatively modest positive market movements could overturn the identified deficits. Accordingly, the Applicant is expected to engage with the Council's standard review mechanisms and trigger points. Given the nil affordable provision at the outset, and the potential for improved viability through positive market trends, these mechanisms are essential to securing additional affordable housing over the project's lifespan.

**APPENDIX 1 – APPRAISAL PRINT-OUT (October 2025)**

Berol Quarter  
FVA Appraisal CJ

Development Appraisal  
Licensed Copy  
01 October 2025

**APPRAISAL SUMMARY****LICENSED COPY**

**Berol Quarter**  
**FVA Appraisal CJ**

**Appraisal Summary for Merged Phases 1 2**

**Currency in £**

**REVENUE****Rental Area Summary**

	<b>Units</b>	<b>ft<sup>2</sup></b>	<b>Rent Rate ft<sup>2</sup></b>	<b>Initial MRV/Unit</b>	<b>Net Rent at Sale</b>
2 Berol Yard BtR	210			32,217	5,243,340
2 Berol Yard Retail	1	6,487	30.00	194,610	194,610
2 Berol Yard Cultural Space	1	1,724	24.00	41,376	41,376
Berol House Retail	1	4,844	30.00	145,320	145,320
2Berol House Offices	1	40,009	27.50	1,100,248	1,100,248
<b>Totals</b>	<b>214</b>	<b>53,064</b>			<b>6,724,894</b>

**Investment Valuation**

<b>2 Berol Yard BtR</b>					
Current Rent	5,243,340	YP @	4.1500%	24.0964	126,345,542
<b>2 Berol Yard Retail</b>					
Market Rent	194,610	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	2,598,264
<b>2 Berol Yard Cultural Space</b>					
Market Rent	41,376	YP @	7.0000%	14.2857	
(3yrs Rent Free)		PV 3yrs @	7.0000%	0.8163	482,502
<b>Berol House Retail</b>					
Market Rent	145,320	YP @	7.0000%	14.2857	
(1yr Rent Free)		PV 1yr @	7.0000%	0.9346	1,940,187
<b>2Berol House Offices</b>					
Market Rent	1,100,248	YP @	6.0000%	16.6667	
(1yr Rent Free)		PV 1yr @	6.0000%	0.9434	17,299,489
<b>Total Investment Valuation</b>					<b>148,665,984</b>

**GROSS DEVELOPMENT VALUE****148,665,984**

Purchaser's Costs		(10,109,287)	
Effective Purchaser's Costs Rate	6.80%		(10,109,287)

**NET DEVELOPMENT VALUE****138,556,698****NET REALISATION****138,556,698****OUTLAY****ACQUISITION COSTS**

Residualised Price (Negative land)		(2,537,531)	(2,537,531)
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**CONSTRUCTION COSTS**

<b>Construction</b>	<b>ft<sup>2</sup></b>	<b>Build Rate ft<sup>2</sup></b>	<b>Cost</b>
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**APPRAISAL SUMMARY****LICENSED COPY****Berol Quarter****FVA Appraisal CJ**

2 Berol Yard Construction Costs	267,836	265.11	71,007,274	
Berol House Construction Costs	<u>59,105</u>	266.96	<u>15,778,960</u>	
<b>Totals</b>	<b>326,941 ft<sup>2</sup></b>		<b>86,786,234</b>	<b>86,786,234</b>
Contingency		5.00%	4,339,312	
MCIL			1,772,914	
LBH CIL			2,702,822	
Monitoring Fee			50,000	
Carbon Levy			327,750	
Travel Plans (Resi/Commercial)			6,000	
TMO			5,000	
Car Club			31,500	
Apprenticeship Support Contribution			53,500	
Construction Logistics Monitoring			20,000	
Energy Plan Review			5,000	
NHS Contribution			25,000	
Public Art Allowance			100,000	
Bridgehead Feasibility Study			25,000	
Waste Recycling Contribution			100,000	
DEN Connection costs			1,900,000	
				11,463,798
<b>Other Construction</b>				
Site Mobilisation (£1,000 per unit)			210,000	
				210,000
<b>PROFESSIONAL FEES</b>				
Professional Fees		9.00%	7,829,661	
				7,829,661
<b>MARKETING &amp; LETTING</b>				
Commercial Marketing	8,211 ft <sup>2</sup>	1.50	12,317	
Commercial Marketing	44,853 ft <sup>2</sup>	1.50	67,280	
Letting Agent Fee		10.00%	148,155	
Letting Legal Fee		5.00%	74,078	
				301,829
<b>DISPOSAL FEES</b>				
BtR Sales Agent Fee		0.50%	588,770	
Commercial Sales Agent Fee		1.00%	208,027	
Commercial Sales Legal Fee		0.50%	104,013	
BtR Sales Legal Fee		0.25%	294,385	
				1,195,195
<b>Additional Costs</b>				
Profit on GDV - Commercial		15.00%	462,115	
Profit on GDV - BtR		12.50%	15,793,193	
Profit on GDV - Commercial		15.00%	2,885,951	
				19,141,259
<b>FINANCE</b>				
Debit Rate 7.000%, Credit Rate 0.000% (Nominal)				
Total Finance Cost				14,166,253
<b>TOTAL COSTS</b>				<b>138,556,698</b>
<b>PROFIT</b>				<b>0</b>

**Performance Measures**

**APPRAISAL SUMMARY**

**LICENSED COPY**

Berol Quarter  
FVA Appraisal CJ

**APPRAISAL SUMMARY**

**LICENSED COPY**

**Berol Quarter  
FVA Appraisal CJ**

<b>Initial MRV</b>	<b>Net MRV at Sale</b>
6,765,600	5,243,340
194,610	194,610
41,376	41,376
145,320	145,320
<u>1,100,248</u>	<u>1,100,248</u>
<b>8,247,154</b>	<b>6,724,894</b>

**APPRAISAL SUMMARY**

**LICENSED COPY**

Berol Quarter  
FVA Appraisal CJ

**APPRAISAL SUMMARY**

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Berol Quarter  
FVA Appraisal CJ

## **GLA Viability Team Comments**

### **Berol Quarter**

<b>Applicant</b>	Berol Quarter Limited
<b>GLA Reference</b>	2025/0371
<b>Local Planning Authority</b>	London Borough of Haringey
<b>LPA Reference</b>	HGY/2025/0930
<b>Date</b>	<b>28 November 2025</b>

## 1. **Introduction**

- 1.1. This document represents the position of the Greater London Authority's Viability Team ("GLAVT") in relation to the viability position of the 'Berol Quarter' scheme at the date of this report.
- 1.2. This report has been prepared to inform the determination of the application as part of the GLA Stage 2 Referral process. Please read this document in conjunction with the Stage 1 GLA viability comments dated 14 August 2025.
- 1.3. This document principally refers to information produced on behalf of the applicant and the viability information produced on behalf of London Borough of Haringey.

### **Stage 1**

- *Financial Viability Assessment ("FVA")*, prepared by DS2 LLP, on behalf of the Applicant dated April 2025
- *Review of Applicant's Financial Viability Assessment ("FVA review")* prepared by Carter Jonas on behalf of LB Haringey, dated July 2025

### **Additional information**

- *Response to Carter Jonas Independent Viability Review Report, June 2025 and GLA Viability Team Review, August 2025 ("FVA addendum")*, prepared by DS2 LLP, dated 25 September 2025
  - *Berol Quarter Response to DS2 Viability Response letter dated 25th September 2025 ("FVA Review Addendum")*, prepared by, dated October 2025.
- 1.4. This document considers whether the Applicant's affordable housing offer meets the relevant requirements sets out in the Development Plan and relevant guidance.

## 2. **Background**

### **Extant consent**

- 2.1. The original planning application referenced HGY/2023/0261 (the "extant consent") was granted subject to a s106 planning obligation, dated 28 February 2025. The planning obligation includes 35% affordable housing. Planning permission was granted by the Council on 3 March 2025.

### **Current application**

- 2.2. On 16 April 2025, a section 73 application was submitted to the Council to vary Condition 2 of the extant consent:

*"Section 73 application to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted 03/03/2025. Permission is sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels. Permission is also sought to alter the permitted level of affordable housing"*

- 2.3. The application was submitted with the FVA to assert that the proposed development, which is largely identical to one approved by the extant consent, cannot provide any affordable housing. The FVA also concludes that the development is not viable, even when no affordable housing is included.

### **3. Planning Policy and Guidance**

- 3.1. There are a number of planning policies and guidance that are relevant to the assessment of viability and contributions towards affordable housing. Key references (which are being referred to for this limited purpose) are summarised below:

#### **National Policy: The National Planning Policy Framework**

- 3.2. The National Planning Policy Framework (NPPF) was published in December 2024 and sets out the Government's planning policies for England and how these are expected to be applied.

- 3.3. In terms of consideration of scheme's viability, Paragraph 59 of the NPPF states that:

*"the weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force".*

- 3.4. Regarding affordable housing needs and requirements, Paragraph 66 states that:

*"Where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures".*

#### **Regional Policy: London Plan 2021**

- 3.5. The London Plan ("LP") is the Spatial Development Strategy for London and forms part of the Development Plan.

- 3.6. LP Policies H4 and H5 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London.

- 3.7. To be eligible to follow the Fast Track Route, LP Policy H5 and the Affordable Housing and Viability SPG set a threshold of 35% affordable housing by habitable room or 50% on industrial or public land.

- 3.8. For Build to Rent development, schemes are also required to meet the specific tenure mix set out in LP Policy H11(C) in order to follow the Fast Track Route (30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents).

#### **Local Policy: Haringey's Local Plan**

- 3.9. LB Haringey's development plan contains strategic policies, development management policies, site allocations and guidance in the form of the Tottenham Area Action Plan.

#### **National Guidance**

- 3.10. National guidance on viability is set out in Planning Practice Guidance (PPG) which was last updated in December 2024 and is relevant to the consideration of this application.

### **Mayor's Guidance**

- 3.11. The following Mayor's guidance and practice note are considered relevant to the assessment of the application:
- Affordable Housing and Viability SPG (August 2017)
  - Accelerating Housing Delivery Planning and Housing Practice Note (December 2024)

## **4. S73 application**

- 4.1 The extant consent includes 35% affordable housing (by habitable room), which was secured by the planning obligation in the section 106 agreement. This is in consistent with Policy H11 of the London Plan to ensure that affordable housing is delivered in the area.
- 4.2 In February 2025, with the signature of the s106 agreement, the applicant acknowledged that the approved scheme was viable with a 35% affordable housing contribution. However, at some point between 25 Feb 2025 and 16 Apr 2025 when the s73 application was submitted, the applicant's position changed and the conclusion was drawn that no affordable housing contribution can viably be made as part of the scheme.
- 4.3 The applicant submitted an FVA dated April 2025 as part of the s73 application to support this position, as required by London Plan policy H5(F), which states that schemes that do not meet the relevant affordable housing threshold must follow the Viability Tested Route.
- 4.4 It is also worth noting that the Statement produced by the Secretary of State for Housing, Communities and Local Government on the 23 Oct 2025 made specific reference to the Government intends to "*clarify the use of Section 73 of the Town and Country Planning Act 1990 so that an application under this section to vary a condition of a planning permission should no longer be used as an alternative means of reconsidering fundamental questions of scheme viability or planning obligations. To that end, the Government will update Planning Practice Guidance in due course to clarify the appropriate circumstances in which a Section 73 application can justifiably be used to modify obligations that are set out in a S106 agreement and will consult on, and consider further, how new national policies for decision making can be used to further embed such practice*"
- 4.5 A relevant appeal decision which should also be taken into account when considering the application is the 158-160 Pentonville Road scheme in Islington (PINS ref 3354825), where the Inspector addressed the changes to the macro-economic circumstance, the submission of the s73 application and the changes to the affordable housing contribution through the submission of viability assessments between paragraphs 27-49. In regard to the use of viability assessment in a section 73 application, paragraph 46 of the decision concluded that: "*It has not been demonstrated that there have been changes to macro-economic conditions, since the original grant of planning permission or the adoption of the SDMP, sufficient to justify a site-specific viability assessment.*"
- 4.6 Whilst it is clear that there has been changes to the macro-economic conditions since the adoption of the Local Plan in 2017, however, the FVA has not demonstrated that there has been significant changes to macro-economic conditions, since the original grant of planning

permission to justify the submission of viability information and the proposed removal of affordable housing contribution entirely.

4.7 The cover letter in support of the s73 application, dated 17 April 2025 (prepared by Lichfields), stated that it took 19 months to finalise the Section 106 agreement for the extant permission, and that the economic environment has changed considerably due to “construction cost inflation, higher interest rates, weakening of funding for Build to Rent and BSA and fire gateway requirements”.

4.8 GLA officers have considered the points made in the cover letter in further details:

“Construction costs inflation”

4.9 Whilst there was significant build cost inflation in 2022 with 8.6% (BCIS All-in TPI), the level of build cost inflation reduced significantly in 2023 (5.2%) and further in 2024 (2.3%). The applicant is aware of these changes prior to the signing the s106 agreement in February 2025, if they were of the opinion that the 35% affordable housing was no longer viable and submit evidence to demonstrate that opinion.

4.10 The requirement of the second staircase was introduced March 2024 and has already been incorporated into the design of the extant scheme prior to planning permission granted in March 2025.

“Higher interest rates”

4.11 The Bank of England base rates peaked in August 2023 at 5.25%, and reduced to 4.5% when the planning permission was granted in March 2025. The applicant did not propose to revise the affordable housing contribution during that period. At the time of writing, the base rate is 4%, and it is anticipated that further cuts to base rates would be made by the BoE in the near future.

“Weakening of funding for Build to Rent”

4.12 There is no information provided by the applicant to demonstrate that there is a weakening of funding for Build to Rent since 2023 or the grant of the extant permission in March 2025.

4.13 The latest Knight Frank report (Build to Rent Market Update Q3 2025) is showing that the supply for multifamily BtR investment remains strong. A recent report produced by Cushman & Wakefield (Marketbeat – Build to Rent Q3 2025) has shown that the BtR investment volumes in the first three quarters of 2025 has been similar to the first three quarters in 2024.

“BSA and fire gateway requirements”

4.14 It is recognised that there have been significant delays recently in the gateway process which have affected construction starts for high density development. This has been acknowledged by the government and in the Policy Note issued by MHCLG, alongside the Written Ministerial Statement by the Secretary of State dated 23 October 2025. It states that Under new leadership, and with enhanced resourcing, the Chair and Chief Executive of the regulator have committed to reducing the existing backlog of 91 buildings by approximately one-third by early November, with a view to eliminating the backlog entirely by the end of the year, and ensuring that new buildings entering the regulatory system from January next year should meet the average target of 12 weeks for a decision.

- 4.15 It is therefore expected that the Gateway process would not unduly delay the progress of the proposed development.

### **Planning balance**

- 4.16 Paragraphs 6.4.10-6.4.13 of the council's planning committee report dated 3 July 2023 for the extant permission stated that 60 affordable homes would be secured, which would make a significant contribution to the delivery of intermediate affordable housing including family homes, and concluded that the proposal would provide significant public benefits in terms of housing.
- 4.17 The Council should reconsider the planning balance of the proposed development in the s73 application, ahead of the stage 2 referral.

## **5. Further comments on viability inputs**

- 5.1 Notwithstanding the concerns in relation to the s73 application, we have reviewed the latest viability information provided by DS2 and Carter Jonas respectively.

### **Market rent**

- 5.2 DS2 have maintained their assumption on the market rent for the BtR units, which is £44psf.
- 5.3 GLA officers have reviewed the additional information provided. Notably, comparable schemes such as The Gessner and The Sessile have extensive amenities which appears to be of a higher specification than the subject scheme and therefore, the £44psf assumption, on a current day basis, can be agreed.

### **Benchmark Land Value**

- 5.4 DS2 have adjusted the yield by 50bps for the commercial building (from 6.5% to 7% for term, and 7.5% for reversion) to account for the building's age, limited specification and fragmented occupancy. This can be agreed.
- 5.5 In terms of premium, both DS2 and Carter Jonas have adopted a 20% premium on the EUV. Noting that existing asset is income generating but clearly dated with fragmented occupancy, we are of the opinion that a 10% premium would be more reasonable in this circumstance.
- 5.6 It is also noted that no value has been attributed to the existing Berol Yard site, this is agreed as there is no evidence to demonstrate that a separate open storage operation is likely to be acceptable in planning policy terms.
- 5.7 Therefore, our opinion is that the site's BLV should be **£7,936,500**, mainly reflecting the existing value of the commercial building (Berol House).

### **OPEX**

- 5.8 It is noted that DS2 and Carter Jonas have agreed (on a without prejudice basis) to adopt an OPEX of 22.5%.

- 5.9 We adopted a 20% allowance in our previous comments. Having reviewed the additional information provided by DS2, we accept the adoption of 22.5% of OPEX in this instance, but we disagree with the inclusion of the marketing allowance (see further comments below).

#### **Purchaser's costs**

- 5.10 It is noted that DS2 have retained the allowance of 6.8% for the purchaser's costs, stating that the appraisal should reflect the full purchaser's costs as standard assumption which would be reflected for an asset on a landowner's balance sheet.
- 5.11 Carter Jonas also adopted the same allowance but retained the 3% allowance as a sensitivity analysis.
- 5.12 Having reviewed the additional information, we remain of the view that the purchaser's costs allowance should reflect the potential utilisation of a Special Purpose Vehicles to facilitate the BTR transaction, as it would be reasonable to assume that a rational developer would opt for this in order to achieve tax efficiencies.
- 5.13 Therefore, we consider that a 3% allowance would be more reasonable for the BTR component, and a 6.8% allowance would be appropriate for the commercial use. We have adopted these assumptions in our appraisal.

#### **Interim Rent**

- 5.14 Both DS2 and Carter Jonas have agreed to remove interim rent from the appraisal. It is accepted that the Gateway 3 is likely to last two to three months (the statutory period is 8 weeks but delays can occur; however, as stated above, the government is addressing the delays caused by the Building Safety Regulator and therefore it would be reasonable to assume that this scheme would unlikely be significantly impacted upon at completion) until occupation of the buildings.
- 5.15 Given the scale and the likely stabilisation period of the scheme, the positions adopted by DS2 and Carter Jonas are agreed.

#### **Commercial income**

- 5.16 DS2 maintained their view that the office component would attract a rental value of no more than £25psf. Carter Jonas maintained their view that an allowance of £27.50psf is reasonable to reflect the proposed new and refurbished office space.
- 5.17 Having reviewed the additional information, our view remains that the £27.50psf is reasonable for this location and specification.

#### **Construction costs**

- 5.18 DS2 have adopted the costs advised by Johnson Associates (£86,786,234 – average £265psf). We have adopted this in our appraisal.

#### **Professional fees**

- 5.19 DS2 maintained their view and adopted a 10% professional fee. Carter Jonas have adjusted their assumption from 8% to 9%, cited a number of schemes which have agreed a fee allowance ranging 7% to 10%.

- 5.20 Whilst the GLA's position remains that a 10% allowance should be the standard assumption for most schemes of this nature, given the scheme is still in deficit even with zero provision of affordable housing, it is questioned whether the overall viability position of the scheme is realistic and therefore, we have tested 9% as a separate sensitivity analysis to cross check the overall viability position.

### **BTR Marketing fee**

- 5.21 DS2 remains of the opinion that a 1% marketing fee should be allowed for the marketing of the BTR scheme. This is not accepted by Carter Jonas who advised that they have already accepted a higher OPEX allowance to account for the marketing fee for the BTR component. A site mobilisation allowance of £1,000 per unit (£210,000 in total) has been adopted by Carter Jonas.
- 5.22 Having reviewed the additional information, it is considered that a separate marketing allowance for BTR is not common in viability assessment, as it is expected that the marketing activities are ongoing as long as the BTR scheme remains operational. It is not considered to be reasonable to allow a separate one-off allowance for the launch of the scheme.
- 5.23 The rationale behind the site mobilisation allowance adopted by Carter Jonas is unclear. Therefore, we have not adopted this allowance in our updated appraisal.

### **Development Programme**

- 5.24 DS2 have provided clarification on the assumed construction programme. We have adopted the same assumptions in the updated appraisal.

### **Community Infrastructure Levy**

- 5.25 CIL liability is likely to be higher with the increase of market units. As stated in our stage 1 response, the LPA should verify the adopted CIL figure.

### **Finance rate**

- 5.26 DS2 maintained their finance rate at 7%. GLA officers maintain the view that whilst the 7% rate is not considered to be exceedingly high, a debit rate of 6.5% would be more in line with comparable schemes referred to the Mayor, particularly it is noted that the BoE base rate has been reduced by 50 basis point since April 2025 (from 4.5% to 4%) and further reductions are likely in the near future.

## **6. Updated viability position – current day**

- 6.1 The updated appraisal shows the viability position of the proposed development when assessed on a current day basis, with no affordable housing:

<b>Residual Land Value</b>	<b>Benchmark Land Value</b>	<b>Surplus/deficit</b>
£1,487,123	£7,936,500	-£6,449,377

- 6.2 In both scenarios, the appraisals are showing that the proposal with nil affordable housing would not be viable when assessed against the Benchmark Land Value, which largely derives from the existing office building at Berol House.

## 7. Sensitivity analysis

- 7.1 As stated in our stage 1 response, the RICS' Financial viability in planning: conduct and reporting Professional Statement at section 2.9 states that all FVA and reviews must undertake sensitivity analysis. This can take the form of testing changes in build costs and GDV and/or testing different inputs.
- 7.2 Paragraph 3.10 of the Mayor's Affordable Housing and Viability SPG requires applicants to demonstrate that their proposal is deliverable and that their approach to viability is realistic.
- 7.3 Sensitivity analysis is particularly important in examining the effect of changes in key inputs would affect the viability output, especially in this case, the latest viability information provided by DS2 and Carter Jonas are showing the scheme as unviable, even when no affordable housing contribution is included.

### **Professional fees**

- 7.4 We have tested 9% professional fees, which is adopted by Carter Jonas. Whilst 10% is considered the standard assumption that can be adopted for this scheme, given the scheme is deemed unviable with no affordable housing by both DS2 and Carter Jonas, it is considered sensible to test how the change to the professional fees on the viability position:

<b>Residual Land Value – 9% professional fees</b>	<b>Benchmark Land Value</b>	<b>Surplus/deficit</b>
£2,225,223	£7,936,500	-5,711,277

- 7.5 The scheme would still be in an unviable position, albeit the extent of deficit has reduced by £738k.

### **BtR block (Berol Yard) only**

- 7.6 The scheme comprises two distinctive elements, the existing Berol House, which is a commercial building that is proposed to be extended and refurbished; and Berol Yard, which is currently an ancillary service yard, where the proposed BtR block would locate. It is noted that in the extant s106 agreement, the two components have been identified as distinct phases and it is assumed that they can be brought forward separately.
- 7.7 As stated above, the Benchmark Land Value is mainly assessed on the basis of the Existing Use Value of the Berol House. There is no EUV attributed to Berol Yard.
- 7.8 Whilst it is clear that both the residential and the commercial elements form part of the application and cannot be separately determined in the planning application, they carry different financial implications which affect the overall viability position.
- 7.9 Therefore, as a sensitivity test for this particular scheme, we have considered the viability position of the scheme based on the BTR block at Berol Yard in isolation, removing the Berol House component. In the interest of consistency, we have retained all the relevant planning obligation costs associated with the office element in the sensitivity testing to allow a direct comparison on the viability impact of the proposed development rather than other associated development costs.

7.10 The result are as follows:

<b>Residual Land Value – excluding Berol House</b>
£5,185,266

7.11 The sensitivity analysis above shows that the BtR block is the more viable element of the scheme, and the Berol House component has a significantly negative impact to the overall scheme, which explains the viability output. If there is no restriction in the planning consent to ensure that both the commercial and the residential elements are brought forward at the same time, then in theory, the BtR block can be brought forward as a distinct phase (as defined in the extant s106 agreement) and that there is no obligation to also bring forward the commercial component.

### **Growth and inflation**

7.12 As the current day position is unviable even with no affordable housing, it is also worth testing growth, to understand the changes of viability position when growth and inflation are assumed, throughout the development period. This is in line with paragraph 3.11 of the Affordable Housing and Viability SPG 2017 concerning the deliverability of the scheme.

7.13 The growth and inflation testing only applies to the residential element only.

7.14 We have tested value growth at 3, 4 and 5%, with inflation assumed at 3%.

#### 3% growth, 3% inflation

<b>Residual Land Value (3% growth/3% inflation)</b>	<b>Benchmark Land Value</b>	<b>Surplus/deficit</b>
£7,481,764	£7,936,500	-£454,736

7.15 The sensitivity testing shows that when growth and inflation are assumed at 3%, the scheme produced a higher residual land value at £7.48m which is only marginally lower than the Benchmark Land Value.

#### 4% growth, 3% inflation

<b>Residual Land Value (4% growth/3% inflation)</b>	<b>Benchmark Land Value</b>	<b>Surplus/deficit</b>
£11,651,392	£7,936,500	£3,714,892

7.16 When applying a growth rate of 4% against a 3% inflation, the scheme produces a surplus (c.£3.71m) indicating that affordable housing could be provided as part of the application.

#### 5% growth, 3% inflation

<b>Residual Land Value (4% growth/3% inflation)</b>	<b>Benchmark Land Value</b>	<b>Surplus/deficit</b>
£15,970,647	£7,936,500	£8,034,147

7.17 When applying a growth rate of 5% against a 3% inflation, the appraisal produces a larger surplus c.£8m.

7.18 It is important to note that when growth and inflation are tested with realistic changes to values and costs throughout the development phase, it is likely that the scheme's viability would improve across the lifetime of the development. In these scenarios, the scheme is likely to be deliverable and likely to be able to provide additional affordable housing.

### Testing 20% Affordable Housing with Grant

7.19 We have also tested a scenario assuming 20% affordable housing is provided, with grant funding being available and eligible for the scheme above the first 10%, based on the latest announced benchmark grant rate which would be available for schemes that has an Investment Partner (usually Registered Provider or the Council) on board. This requires an assumption of the scheme providing at least 20% affordable housing at 30% LLR and 70% DMR (subject to the same affordability and eligibility criteria as set out in the London Plan).

7.20 The 20% notional scheme details are as follows:

20% notional scheme	Unit	Habitable room	Floorspace (sq.ft)
Market	168	455	122,750
LLR	12	34	8,886
DMR	30	80	21,896
<b>Total</b>	<b>210</b>	<b>569</b>	<b>153,532</b>

7.21 The notional 20% affordable housing (without grant funding) viability position is as follows:

Residual Land Value (20% AH – 30% LLR 70% DMR)	Benchmark Land Value	Surplus/deficit
-£5,710,028	£7,936,500	-£13,646,528

7.22 The appraisal shows that at 20% affordable housing, without grant funding and CIL relief, the scheme would produce a c.-£13.6 deficit with a negative land value of -£5.71m.

### Grant funding

7.23 According to the policy note published by the government and the GLA in Oct 2025, the latest benchmark rates are as follows:

- £220,000 per home for Social Rent;
- £70,000 per home for Shared Ownership;
- £90,000 per home for Intermediate Rent (where rents are *above* London Living Rent benchmarks); and
- £140,000 per home for Intermediate Rent (where rents are *below* London Living Rent benchmarks).

7.24 We have tested the notional 20% affordable housing scheme with the first 10% being nil grant, and the next 10% subject to the above grant rate (£90,000 per home for DMR, £140,000 per home for LLR). The viability position is as follows once grant funding is included:

Residual Land Value (20% AH, Grant assumed on top of first 10%)	Benchmark Land Value	Surplus/deficit
-£1,961,821	£7,936,500	-£9,898,321

- 7.25 The assumption of 20% affordable housing with grant funding results in a negative land value at -£1.96m, and a deficit of c.-£9.9m.

### Testing 20% Affordable Housing with CIL relief

- 7.26 We have also tested a potential scenario where CIL relief is available following the publishing of the Written Ministerial Statement in Oct 2025.
- 7.27 Assuming up to 50% borough CIL relief can be allowed, the scheme's viability position is as follows:

Residual Land Value (20% AH with CIL relief)	Benchmark Land Value	Surplus/deficit
-£2,971,963	£7,936,500	-£10,908,463

- 7.28 The assumption of 20% affordable housing with only CIL relief, this results in a negative land value of -£2.97m and a deficit of c.£10.9m.

### CIL relief + Grant funding

- 7.29 We have also tested the combination of CIL relief and grant funding being eligible for the 20% AH scenario:

Residual Land Value (20% AH with CIL relief + grant funding)	Benchmark Land Value	Surplus/deficit
-£610,410	£7,936,500	-£8,546,910

- 7.30 The assumption of 20% affordable housing with CIL relief and Grant funding resulted in a reduced deficit of -£8.55m.
- 7.31 It appears that when assuming 20% affordable housing, the incorporation of CIL and grant funding would not overcome the deficit on a current day basis. However, it is worth noting that the deficit is significantly smaller than the deficit identified by both DS2 and Carter Jonas assuming the scheme at 0% affordable housing.

### Sensitivity analysis conclusion

- 7.32 The sensitivity analysis allows a better understanding of the viability position of the scheme, with relatively small changes to the schemes input could have significant impact on the outcome of the viability assessment. Assessors should avoid relying on a single approach, particularly as residual assessments are very sensitive to changes to the inputs, including programme and timing of inputs and costs which are often not transparent and difficult to assess based on the printout version of the argus summary.
- 7.33 The sensitivity analysis provides a better understanding on why the scheme is, on the basis of the viability assessment being carried out on a current day basis, would not provide any affordable housing.
- 7.34 The viability position of the scheme can change through time – this is shown in the sensitivity analysis for growth and inflation. The material weight to be given to the viability assessment, including both the current day and the growth scenarios, are a matter for the

decision maker to take into account when they assess the planning application and consider the overall planning balance of the scheme.

7.35 The commercial element of the scheme clearly has a negative impact on the overall viability, including the scheme's Benchmark Land Value which largely derives from the existing office building.

## **8 Deed of Variation and Review Mechanism**

8.1 LP Policy H5 sets out that schemes which follow the Viability Tested Route would need to be subject to an early and late viability review.

8.2 It is noted that the following obligations have been assumed in the viability appraisal and should therefore be included in the Deed of Variation:

- Monitoring Fee - £50,000
- Carbon Levy - £327,750
- Travel Plans - (Resi/Commercial) £6,000
- TMO - £5,000
- Car Club - £31,500
- Apprenticeship Support Contribution - £53,500
- Construction Logistics Monitoring - £20,000
- Energy Plan Review - £5,000
- NHS Contribution - £25,000
- Public Art Allowance - £100,000
- Bridgehead Feasibility Study - £25,000
- Waste Recycling Contribution - £100,000
- DEN Connection costs - £1,900,000

8.3 We have reviewed the draft heads of terms and have provided comments in a separate document.

## **9 Conclusion**

9.1 Based on our assessment of the scheme on a current day basis, the proposed development would not be viable, even without any affordable housing contributions.

9.2 Therefore, decision makers should consider the updated viability position, as well as the sensitivity testing carried out in this report when determining the planning application and afford weight to the submitted viability information. Based on the assessment above, it appears that the scheme would only be viable when reasonable growth and inflation are applied.

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## Appendix 12: Internal and external consultation responses

Response	Officer comment
<b>INTERNAL</b>	
<b>LBH Pollution</b>	
<p><b><u>Re: Removal/variation of conditions on HGY/2025/0930 at Berol Quarter, Ashley Road , Tottenham Hale , London, N17 9LJ</u></b></p> <p>Thank you for contacting the Carbon Management Team (Pollution) regarding the above application made under Section 73 of the Town and Country Planning Act 1990 to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted 03/03/2025. Permission is sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels. Permission is also sought to alter the permitted level of affordable housing and I would like to comment as it relates to matters of this service as follows.</p> <p>Having considered the condition in question (Approved Plans and Documents) and the nature of the development, <b>please be advised that we have no objection to the proposed application with regards to land contamination and air quality.</b></p> <p><b>However, the applicant is reminded of the need to comply with the previous conditions on both grounds i.e. land contamination and air quality, as outlined in the approved planning permission HGY/2022/0280 where applicable for the previously approved development. The relevant conditions have been copied below:</b></p> <p><b>1. <u>Land Contamination</u></b></p> <p>Before development commences other than for investigative work:</p> <p>a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until the desktop study has been approved in writing by the Local Planning Authority.</p>	<p>Noted, conditions on Land Contamination, Unexpected Contamination, NRRM, Management and Control of Dust, and Combustion and Energy Plant. These aspects form part of the recommended conditions.</p> <p>Considerate Constructors Scheme forms part of the s106 and the CHP Facility condition is not required as there is no facility proposed nor is one required. So, the condition would not be reasonable or necessary.</p>

- b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site, using information obtained from the desktop study and Conceptual Model. The investigation must be comprehensive enough to enable: an updated risk assessment to be undertaken, refinement of the Conceptual Model, and the development of a Method Statement Detailing the remediation requirements. The updated risk assessment and refined Conceptual Model along with the site investigation report, shall be submitted and approved in writing by the Local Planning Authority.
- c) If the updated risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements and any post remedial monitoring, using the information obtained from the site investigation, shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site. The remediation strategy shall then be implemented as approved.
- d) Before the development is occupied and where remediation is required, a verification report demonstrating that all works detailed in the remediation method statement have been completed shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

## **2. Unexpected Contamination**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reasons: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels water pollution from previously unidentified contamination sources at the development site in line with paragraph 109 of the National Planning Policy Framework.

## **3. NRMM**

- a) Prior to the commencement of the development, evidence of site registration at <http://nrmm.london/> to allow continuing details of Non-Road Mobile Machinery (NRMM) and plant of net power between 37kW and 560 kW to be uploaded during the construction phase of the development shall be submitted to and approved by the Local Planning Authority.

- b) Evidence that all plant and machinery to be used during the demolition and construction phases of the development shall meet Stage IV of EU Directive 97/68/EC for both NO<sub>x</sub> and PM emissions shall be submitted to the Local Planning Authority.
- c) During the course of the demolitions, site preparation and construction phases, an inventory and emissions records for all Non-Road Mobile Machinery (NRMM) shall be kept on site. The inventory shall demonstrate that all NRMM is regularly serviced and detail proof of emission limits for all equipment. All documentation shall be made available for inspection by Local Authority officers at all times until the completion of the development.

**Reason:** To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ

#### **4. Management and Control of Dust**

No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved in writing by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment. The works shall be carried out in accordance with the approved details thereafter.

Reason: To Comply with Policy 7.14 of the London Plan and GLA SPG Dust and Emissions Control.

#### **5. Considerate Constructors Scheme**

Prior to the commencement of any works the site or Contractor Company must register with the Considerate Constructors Scheme. Proof of registration must be submitted to and approved in writing by the Local Planning Authority. Registration shall be maintained throughout construction.

**Reason:** To Comply with Policy 7.14 of the London Plan.

#### **6. Combustion and Energy Plant**

Prior to installation, details of the gas boilers to be provided for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NO<sub>x</sub> emissions not exceeding 40 mg/kWh (0%).

Reason: As required by The London Plan Policy 7.14.

#### **7. Combined Heat and Power (CHP) Facility**

Prior to the commencement of the development, details of the Combined Heat and Power (CHP) facility of the energy centre or centralised energy facility or other centralised combustion process and associated infrastructure shall be submitted in writing to and for approval by the Local Planning Authority. The details shall include:

<p>a) location of the energy centre;  b) specification of equipment;  c) flue arrangement;  d) operation/management strategy; and  e) the method of how the facility and infrastructure shall be designed to allow for the future connection to any neighbouring heating network (including the proposed connectivity location, punch points through structure and route of the link)  f) details of CHP engine efficiency</p> <p>The Combined Heat and Power facility and infrastructure shall be constructed in accordance with the details approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>Reason: To ensure the facility and associated infrastructure are provided and so that it is designed in a manner which allows for the future connection to a district system.</p> <p><b><u>Informative:</u></b></p> <ol style="list-style-type: none"> <li>1. Prior to refurbishment or any construction work of the existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.</li> </ol>	
<p><b>EXTERNAL</b></p>	
<p><b>Greater London Authority (GLA) / The Mayor of London</b></p>	
<p><b>Strategic planning application stage 1 referral</b></p> <p><b>Recommendation</b>  That Haringey Council be advised that the application does not comply with the London Plan for the reasons set out in paragraph 21. The Mayor does not need to be consulted again if the borough decides to refuse the application.</p> <p><b>Context</b>  1. On 24 April 2025 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town &amp; Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other</p>	<p>GLA Viability Officers subsequently sent comments and ended up agreeing that the scheme could not support a contribution to affordable housing. This is discussed in Section 6 of the Committee report.</p>

comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following categories of the Schedule to the Order 2008:

- Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats"
- Category 1B: "Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres" and
- Category 1C: "Development which comprises or includes the erection of a building of more than 30 metres high and is outside the City of London".

3. In this case, Haringey Council need not refer the application back to the Mayor should it resolve to refuse the application, but the comments made in this report should be taken into account in its determination of the application. Should Haringey Council resolve to approve the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.

4. The Mayor of London's statement on this case will be made available on the GLA's public register:

<https://planapps.london.gov.uk>

#### **Site description**

5. The subject site is located within Tottenham Hale, comprises two plots, being 2 Berol Yard as well as Berol House. It forms an 'L' shaped parcel of land with a total area of 0.5 hectares. 2 Berol Yard is a vacant plot, whilst Berol House is a three storey locally listed building utilised as an office building (circa 3,400 sqm). The brownfield site is located within the Lee Valley Opportunity Area and it is partly located within the Tottenham Hale Town Centre.

#### **Strategic case history**

6. On 3 March 2025, the Deputy Mayor, under delegated authority, allowed Haringey Council to determine planning application itself for the refurbishment and extension of Berol House to include Use Class E floorspace; and the redevelopment of 2 Berol Yard to provide new residential homes and Use Class E floorspace (LPA ref: HGY/2023/0261; GLA refs: GLA/2023/0100/S1 and GLA/2023/0226/S2).

7. The development of 2 Berol Yard comprises the provision 210 Build to Rent (BTR) homes including 35% (by habitable room)

affordable housing (30% London Living Rent; 70% Discount Market Rent). Details of this proposal

8. The Section 73 (S73) application seeks amendments to the extant planning permission to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels. Permission is also sought to alter the permitted level of affordable housing, reducing it from 35% down to 0%.

#### **Strategic planning issues and relevant policies and guidance**

9. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Local Plan: Strategic Policies DPD (2013 with alterations 2017); Haringey Local Plan: Development Management DPD (2017); Haringey Local Plan: Site Allocations DPD (2017); Tottenham Area Action Plan (2016); Tottenham Hale District Centre Framework (2015); and the London Plan 2021.

10. The following are also relevant material considerations:

- The National Planning Policy Framework (2024) and National Planning Practice Guidance;
- National Design Guide (2021); and
- Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on housing, affordable housing, design, heritage, and transport which can be found on the GLA's website.

#### **Land use principles**

11. The principle of the land use (office and residential) has been established through the extant permission and remains accepted. However, in addition to the proposed amendments to conditions on the extant permission, the applicant seeks to reduce the affordable housing offer from 35% to 0%, by way of a formal deed of variation of the original S106 agreement.

12. The current proposal would fail to address London wide and local affordable housing need to the same extent as the approved permission and would conflict with London Plan Policies H4 and H5. The absence of any affordable housing materially impacts on overall planning balance of the scheme. This will be considered further at the Stage 2, if the Council resolves to grant permission.

#### **Affordable housing**

13. The affordable housing to be provided in the extant scheme is secured through a S106 planning obligation and as such, S73 of the TCPA 1990 (as amended) which grants a new permission subject to new or amended planning condition(s), or without compliance with a planning condition, is not considered to be the appropriate basis for assessing a reduction in affordable housing

obligations. Nevertheless, on the basis that the application has been validated and referred, the following assessment is made with respect to affordable housing.

14. As noted above, the extant permission was granted for 210 Build to Rent (BTR) homes, which included 35% affordable housing (by habitable room) comprising a tenure split of 30% London Living Rent; 70% Discount Market Rent), which were secured in the Section 106 agreement. The application seeks to reduce the affordable housing provision to 0% and the applicant has prepared a Financial Viability Assessment (FVA) to justify the proposal. The FVA includes an Order of Cost Estimate dated 7 February 2025 which predates the current signing of the S106 and planning permission.

15. GLA officers will robustly scrutinise the FVA to ensure that the maximum level of affordable housing is secured. Advice will be provided in due course and further discussion with the applicant team and the Council will be required prior to consideration at local Planning Committee. The Council is requested to share its viability advice with GLA officers at the earliest opportunity. An update on viability will be provided prior to the Council's committee meeting and affordable housing and viability will be considered further at the Stage 2 referral, if the Council resolves to grant permission.

16. In summary, the proposal to reduce the level of affordable housing to 0% does not demonstrate compliance with London Plan Policies H4 and H6, nor is it a verified viability position.

### **Urban design**

17. The only design related amendment seeks the replacement of glass panels with inward opening doors at roof level of 2 Berol Yard. This raises no strategic concern. Local planning authority's position

18. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

### **Legal considerations**

19. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for

the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

**Financial considerations**

20. There are no financial considerations at this stage.

**Conclusion**

21. London Plan policies on office, residential development, affordable housing, design, transport, sustainable development, and environment relevant to this application. The application does not comply with the London Plan as summarised below:

- Land use principles: The development of this brownfield site for a high-density, mixed-use development remains acceptable in principle. However, it is considered that the proposed nil affordable housing offer would conflict with London Plan Policies H4 and H5. The absence of any affordable housing materially impacts on overall planning balance of the scheme. This will be considered further at the Stage 2, if the Council resolves to grant permission.
- Affordable housing: The proposal to reduce the level of affordable housing from 35% to 0% does not demonstrate compliance with London Plan Policies H4 and H6, nor is it a verified viability position. The FVA is currently being robustly scrutinised by GLA Viability Officers.
- Urban design: No strategic concerns regarding the very minor changes to the design of the scheme.

**Health and Safety Executive (HSE)**

**Headline response from HSE**  
**'no comment'**

**Scope of consultation**

1.1. The above consultation relates to an application to vary condition 2 of permission HGY/2023/0261, to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels, and to alter the permitted level of affordable housing.

**Previous consultation**

1.2. HSE issued a substantive response on 07/03/2023 (ref pgo-2809) in relation to the extant permission HGY/2023/0261, with a 'content' headline.

Noted, there have been no changes to the internal arrangement of the building and fire safety.

<b>Current consultation</b>  1.3. The current consultation was received on 24/04/2025. It is noted that the fire statement provided with the current consultation is dated 21/11/2022. As no revised fire statement has been provided for assessment, HSE has no comment to make.	
<b>Metropolitan Police - Designing Out Crime Officer (DOCO)</b>	
No issues with the application proposals related to the application and look forward to consultation with the design team in regard to achieving Secured by Design accreditation for the project.	Noted.

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**Appendix 13: Neighbour representations and officer responses**

Objection/Support/Comment	Response
<p data-bbox="204 344 767 416"><u>Objection from resident of Rycroft Way N17</u></p> <p data-bbox="204 454 719 562">The list below is not exhaustive but demonstrates why the development economics are challenged.</p> <p data-bbox="204 600 810 853">Increases in finance costs because of rising interest rates. The Bank of England has increased the base rate of interest from 0.10% (November 2021) peaking at 5.25% between August 2023 and July 2024 before being recently revised to 4.5% (March 2025) increasing debt costs."</p> <p data-bbox="204 891 810 1223">When the planning application was made in January 2023 base rate was 3.5%- with clear national guidance that further rises were to come- Haringey council itself published in January 2023 advice that correctly forecast a peak of 5.25% in late 2023. The developer is responsible for its failure to do its own due diligence before submitting their application.</p> <p data-bbox="204 1261 815 1697">"Increases in Bank of England interest rates and risk-free rates is also having detrimental impact on investment yields, resulting in reduced values for commercial or other 'living' investment uses such as student housing and BtR. As the yield on government bonds increases, the attractiveness of investing in commercial property, which in comparison is inherently riskier, reduces. This in turn increases the yields required by investors, reducing the revenue achievable for these uses."</p> <p data-bbox="204 1736 810 2024">The yield required by investors being higher than they believe they can achieve is not an affordability issue and the expectation of a yield is a straight forward admittance that the scheme is viable, they would just prefer a higher return on their investment. In their own documentation the assumption of the yield for BtR is</p>	<p data-bbox="842 344 1449 562">The FVA has been independently assessed by financial viability consultants Carter Jonas and by the GLA's Viability Team who have both found that the proposal cannot support an affordable housing contribution.</p> <p data-bbox="842 600 1449 779">The applicant wishes to proceed and deliver the scheme on the basis that current market conditions will improve and the homes would begin to make a return for the developer in the future.</p>

Objection/Support/Comment	Response
<p>4.15%, which is lower than the yield for commercial property, which is 7%.</p> <p>To quote Savills "UK BTR had a record-breaking year in 2024, with investment volumes exceeding £5 billion for the first time" Which would certainly be surprising considering the claims of a lack of access to capital or unaffordability within that sector. They in fact specify the current environment in the BtR investment is "A lack of opportunities relative to demand has created competition between lenders and applied downward pressure on pricing."</p> <p>"BtR Management Cost Inflation – increases in the cost of labour and energy has increased the cost of managing BtR schemes and reduced the gross to net efficiency on rental income."</p> <p>They don't provide a basis to support this claim in the determination of OPex, They use figures from a recent Grainger PLC document that shows an improvement in their gross-to-net efficiency over 2024.</p> <p>When arriving at an appropriate yield they look to published works like Knight Frank yield guide, March 2025 produced below-Knight Frank yields are provided on a Net Initial Yield (NIY) - this is a calculation arrived at by comparing Net Operating Income to Gross Property Value. With costs like management, letting, maintenance, utility and voids costs etc deducted from the Gross profit to arrive at the Net Operating Income. However under the "sales, marketing and legal costs" they include the following costs- this is an line item with a figure attached but it would appear to be double counting OPex costs (ie the cost of managing the units as they intend to) as disposal costs (ie the cost of theoretically selling the units in order to arrive at a valuation)</p>	

Objection/Support/Comment	Response
<p>Letting Agent Fee – 10% (of 1st year’s annual rental income) Letting Legal Fee – 5% (of 1st year’s annual rental income)</p> <p>Which would reduce the Gross Development Value while increasing the costs.</p> <p>Also when calculating OPEX they use Grainger as a guide for the figure they arrive at being at the “latest full year results (December 2024) reported by Grainger PLC, the largest residential landlord in the UK, indicate an OPEX of 28.9% for their stabilised portfolio.”</p> <p>Quoting directly from Grainger plc results announcement November 2024 - “Operating expenses continue to be improved with our ‘gross to net’ leakage down from 25.5% to 25%, a 75% gross rental margin. This margin is after refresh and refurbishment costs which are included in the 25%.”</p> <p>Firstly they seem to have misquoted Grainger plc, claiming 28.9%, one of many basic errors in the document, indicating that the numbers used in the document have been repeatedly changed to suit the argument desired. It also highlights how the report can distort reality with small changes in baseline assumptions. Selecting a large mature portfolio which now requires both higher maintenance and which has been undertaking a refurbishment program and still has a OPex in decline is inappropriate to compare to a brand new properties OPex. A 5% drop in OPex would net a BtR valuation £7m higher than otherwise.</p> <p>The assumptions of rental yield of £25 per sq ft for high quality newly refurbished office space at a very well connected tube station is likely weighted by the current low rent of the property which considering the</p>	

Objection/Support/Comment	Response
<p>long period of development in the area and uncertainty about this proposal is likely to be suppressed from market value. 40,0000 sq ft of office space incorporated into a new development with amenities is a very different proposal to Fountanye road, which is also proposed for development. 49A Oxford Road, N4 3EY at £39.50 and 17000 sq ft is a better example but being half a mile from Finsbury Park (2 stops away from Tottenham Hale) and isolated from any surrounding amenities like the emerging Berol Quarter it could still undersell the valuation “ Conversely, rents in Tottenham Hale are closer to £30 per sq ft” this is referring to Tottenham Hale prices being lower than other areas surveyed, therefore approaching closer from above £30. Despite this office space is priced at £25 per sq foot</p> <p>For retail the two units it surveyed in tottenham hale, in the Berol Link are both shell and core and short leases, ie likely to be the absolute bottom that retail could achieve in the area and they both achieved £30 per sq ft- you would expect some premium above that for a standard lease with Category A finish.</p> <p>Most recent inflation figure for rent in London is 9.1% annualised, which is a drop from its high. The expected lead of 56 months is factored into the projected cost of borrowing. The applicant also relies on inflationary costs elsewhere in their report- with cost inflation considered a medium risk. Therefore to be balanced this should also be applied to their projection of income. Taking a conservative 4.5% figure and applying it cumulatively over the 56 months projected from start of project to capitalisation- 12 months pre-construction, 40 months construction, 4 months to capitalisation. Applying that to their assumed gross annual rent of £6,765,600 would project a</p>	

Objection/Support/Comment	Response
<p>gross annual rent on capitalisation of £8,273,041. Resulting, all things being equal, in an net value of £140,243,003 for the BtR units. £26m higher than their current projection.</p> <p>It also makes an assumption that if BtR yields go up then this would have a negative impact on their viability but this assumption is illogical and again highlights how unrealistic the process is- they are the holder of the yield on this potential unit, not a potential buyer. If the overall market produces a larger net yield on the same investment than expected by an agent like Knight Frank when recommending potential marketable rates to their clients then they will profit from that trend. It's only if the yields specifically grow because of market uncertainty leading to a lack of potential buyers and therefore an upward pressure on yields demanded by buyers would they lose. In the current environment with BtR experiencing a booming market and London rent prices rising by 9.1% annually the former is more likely than the latter. As its own figures show a mere 10% increase in BtR rents erases much of the deficit.</p> <p>Having said all that, and taking the applicants figures at face value, the applicants documentation highlights that even with the proposed changes to BtV is still not meeting viability.</p> <p>“of the report demonstrate the RLV generated on a 100% private basis generates a negative land value“</p> <p>So what gain is there in making the change? Either way they are not changing the status of the project- it will still be “challenged financially” and couldn’t possibly be proceeding.</p>	
<p><u>Objection from resident of Bruce Castle Rd N17</u></p>	<p>Current market conditions mean that the development is unviable. This has been</p>

<b>Objection/Support/Comment</b>	<b>Response</b>
I object to any reduction in the level of social/affordable housing	<p>independently tested by Carter Jonas and the GLA who concur with the findings of an FVA submitted by the applicant. The scheme cannot support any affordable housing contributions.</p> <p>The scheme would still deliver several public benefits including significant CIL contributions.</p>

16 January 2026

**Bradley Tollon**  
**GLA Viability Team**

Dear Bradley

**BEROL QUARTER, TOTTENHAM HALE, LONDON BOROUGH OF HARINGEY (VIABILITY CASE 2025/0371)**

### **Introduction**

We refer to the meeting (06 January 2026) with the GLA and the Local Authority Officer in respect of the above scheme. There is agreement between the Applicant, the Local Authority and the GLA that due to the prevailing market conditions, the scheme cannot viably deliver any affordable housing at this time. However, there are a number of important points of principle where in our opinion the GLA viability assessment has diverged from planning policy or accepted RICS guidance for such assessments and we have noted these below.

The Site benefits from Planning Permission (HGY/2023/0261) that was granted on 3rd March 2025. The subsequent Section 73 application (LPA ref HGY/2025/0930) removes the affordable housing given the significant current viability changes in light of the volatile economic and geopolitical environment and the need to ensure that any subsequent planning consent can ultimately be delivered.

### **GLA meeting key matters**

DS2 and the Applicant met with the Council and the GLA Viability Team to discuss a range of outstanding viability matters, albeit importantly all the parties are in agreement on the maximum viable level of affordable housing that the project can currently support. The main areas of divergence are as follows:

- BLV premium
- Purchaser's costs on the BtR GDV
- Commercial revenue assumptions
- Launch / let up costs
- CIL



I have included concise comments below on each of the points we discussed. These should be read in conjunction with information already provided, by way of the April 2025 FVA and my subsequent September 2025 letter.

As was discussed, I understand that the Council are proposing to determine the current application in February 2026.

In terms of background, whilst the extant consent was secured in 2025, this followed an extensive period of dialogue on the Section 106 as the application was presented to planning committee members in 2023 further following the submission of the application in 2022.

Over the intervening period, the proposals have been blighted by increased costs (driven by both market forces and regulatory changes) and also a softening of the valuation of Build to Rent (BtR) developments. Yields for BtR developments are currently 65bps to 80bps softer than when this scheme was devised, which has reduced the income by over £27 million. However, recent reductions in interest rates suggest the potential for yield compression which would improve the viability of BtR development is more positive (albeit with current significant geopolitical / economic risks).

As we discussed with GLA Officers, we have also tested the viability of the proposal with the benefit of a certain amount of reasonable rental growth and some yield compression, in order to seek to alleviate deliverability concerns.

The results are included below. The applicant has a significant track record of delivery in the local area and subject to improving conditions, has every intention of delivering a planning consent (subject to this being secured).

### **BLV Premium**

- Existing asset is 84 percent occupied with leases extending to 2034 and has been held by the current owner for over 30 years. Details of the leases were provided previously in the DS2 Financial Viability Assessment (April 2025)
- The PPG test on the premium relates to an incentive above EUV compared to all other options available (i.e. a no development scenario)
- A 20 percent premium was agreed by BNPPRE as reasonable as part of the application for the extant scheme, and has recently upon review also been deemed to be reasonable by Carter Jonas
- On the GLA SPG's own hierarchy of 10 to 30 percent, 20 percent for a good quality income producing asset with a long track record of performance is in our opinion, entirely reasonable and would be consistent with the premium adopted on a wide range of other similar assets and indeed for the purposes of local plan policy testing.



### Purchaser's Costs

- The market net yield sheets (produced by the likes of CBRE and Knight Frank) are based on stabilised assets and therefore assume full Purchaser's Costs of 6.8%. The GLA valuation of 2 Berol Yard is a net yield of 4.15% based on the Knight Frank yield sheet for a stabilised BtR asset and therefore must include full Purchaser's Costs.
- If, in anticipation of an alternative form of procurement, a lower rate of Purchaser's Costs (3.57%) was to be applied, then an alternative and softer net yield would need to be applied, reflecting the increased risk to the funder of not buying a stabilised asset, but purchasing a construction project with all of the inherent risks associated with delivery.
- Whether a development is delivered directly or by way of a forward fund (FF) or forward commit (FC), these are simply different procurement routes and the RICS Professional Standard (section 5.4) for BtR valuation is clear that the investor's true net position should be reported, i.e. net of purchaser's costs.
- Further, notwithstanding this, there is no guarantee in this dysfunctional marketplace that FF / FC scenarios could be secured given the current market net yield expectations and as such any sensitivity to illustrate the impact of reduced costs under a specific delivery scenario, should be just this (not the base position).
- Given the above, and the GLA's valuation being based on a stabilised asset, we consider that there are no reasonable grounds to diverge from the RICS guidance to apply full Purchaser's Costs at 6.8%.

### Commercial Revenue Assumptions

- As discussed, we remain of the opinion that the revenue assumption for the newly provided commercial space is too optimistic having regard to a recent letting at the neighbouring Gessner building of 14,500 sqft which was let at £145,000 after an 18-month rent free period for shell and core.
- Whilst there is an expectation that market rents for the commercial units will eventually rise, the existing market remains subdued and the suggested 10% increase to £27.50psqft from £25.00psqft is not reflective of the commercial situation in Tottenham Hale. Please find attached a copy of the lease at Appendix One.

### Launch (Marketing) Costs

- The development will provide an operator with an empty building however the Net Operating Income (NOI) has been capitalised using a market net (stabilised) yield. The construction cost plan excludes any of the FFE needed to enable the building to operate or furnish the amenity areas.
- The market net yield assumes a building is running at a high level of occupancy (commonly 97-98 percent) and for a period of time.



- The RICS Professional Standard (section 5) includes detail in terms of the operating expenditure that is accounted for in a deduction from gross to net income. This does not include certain costs such as upfront marketing to get the building let, service charge voids / council tax and FF&E. As such, we are of the opinion that the £1.2m in the appraisal is on the low side given the number of units and amenity areas.

These real costs which are recognised by the RICS as being a justified inclusion in order to get to a stabilised income that reflect the market net yield used to value the development. If these are costs are not included, the construction cost plan should be increased to provide an FF&E allowance

## CIL

- Please see attached a copy of the Charging authority's CIL liability notice equating to:
  - MCIL: £1,906,349.44
  - Local CIL: £2,828,364.32

We have updated the attached appraisal on the basis of the above figures and ask that this is agreed as the basis for determining this application. Please find attached a copy of the CIL liability notice from the Charging Authority at Appendix Two.

## Further Sensitivity Analysis

Adopting DS2's latest appraisal (included at Appendix Three), as included in our September 2025 response to the GLA (and the Council), we have adopted incremental 0.1 bps improvements in the market net yield and 3 percent incremental improvements in the net operating income.

The table attached at Appendix Four illustrates the impact on the residual land value when increasing the rents in 3 percent increments and 0.1 percent on the BtR yield.

We would note that the green cells illustrate scenarios where the residual land value is in excess of the £8,658,000 BLV as proposed by DS2 (and as per our Sept 2025 response) and the £7,936,500 BLV as defined by Carter Jonas in their assessment. It is perhaps worth noting that the BLV as proposed in the April 2025 FVA was £10,971,043 and as such, a significant concession has already been applied to the original EUV plus.

## Summary

As noted in the meeting, the Applicant has a track record of delivery in the local vicinity and is planning on delivering the planning consent subject to a planning consent being secured.

All parties are in agreement that the application is delivering the maximum amount of affordable housing in accordance with the policy tests and this is a direct function of the dysfunctional marketplace that we find ourselves in.



The scheme does however deliver a significant number of benefits including 210 homes, new commercial spaces, c. £4.7 million in CIL receipts and associated S106 contributions. The sensitivity analysis included in this note illustrates how with relatively modest increases in rental income and yield compression, the scheme can become viable.

#### **DS2 LLP**

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## Follow-up Comments from the GLA on DS2's Viability Response Dated 16 January 2026

GLA Case Number:	2025/0371
Scheme Address:	Berol Quarter, N17
Applicant:	Berol Quarter Limited
Local Planning Authority:	London Borough Haringey
Date:	27 January 2026
Prepared by:	Bradley Tollon

### 1. Summary

#### Context

- 1.1 This document represents the position of the Greater London Authority's Viability Team (GLAVT) in relation to the viability of the Berol Quarter, N17 9LJ scheme at the date of this report.
- 1.2 The original planning application referenced HGY/2023/0261 (the extant consent) was granted permission subject to a Section 106 (S106) agreement, dated 28 February 2025. The agreement includes a planning obligation to deliver 35% affordable housing on-site. Planning permission was granted by the Council on 3 March 2025.
- 1.3 On 16 April 2025, a section 73 application was submitted to the Council to vary Condition 2 of the extant consent:
- "Section 73 application to vary Condition 2 (Approved Plans and Documents) attached to planning permission HGY/2023/0261 granted 03/03/2025. Permission is sought to alter the approved drawings to show inward opening doors at the roof level of 2 Berol Yard instead of the permitted glass panels. Permission is also sought to alter the permitted level of affordable housing"*
- 1.4 The proposed development is largely identical to one approved by the extant consent except for the reduction in affordable housing.

#### Viability Summary

- 1.5 In April 2025, DS2 on behalf of the applicant submitted a Financial Viability Assessment (FVA) as part of the S73 planning application. The FVA concludes that the proposed scheme incorporating no affordable housing would produce a deficit of -£23,718,207 when the Residual Land Value (RLV) of -£12,747,164 is compared against a £10,971,043 Benchmark Land Value (BLV). DS2 concluded that the proposed scheme with 100% market unit is in deficit.
- 1.6 On behalf of the LPA, Carter Jonas (CJ) reviewed the FVA and advised that the proposed scheme would produce a deficit of -£8,106,056 when the RLV of -£169,556 is compared

against a £7,936,500 BLV. CJ also concluded that the proposed 100% market unit scheme was in deficit.

- 1.7 DS2 prepared a response (25 September 2025) to both the CJ and GLA initial reports. The report concludes that the deficit is reduced to £15,000,947 but that in a 100% private scenario that no affordable housing is financially viable.
- 1.8 In October 2025, CJ provided a response that continued to consider individual assumptions made by DS2 but concluded that no affordable housing as financially viable as part of the application but that the deficit was reduced to £7,599,568.
- 1.9 Subsequently the GLA provided a response (28 November 2025) which concluded that on a current day basis, the proposed development would not be viable, even without any affordable housing contributions. It set out that decision makers should consider the updated viability position, as well as the sensitivity testing carried out in the report when determining the planning application and afford weight to the submitted viability information. Based on the assessment, it appears that the scheme would only be viable when reasonable growth and inflation are applied.

### **Update**

- 1.10 The applicant, including DS2, met with the GLA and LPA officer on 6 January 2026 about the application. At the meeting it was agreed that DS2 would provide a written response which sets out the key assumptions where agreement is yet to be reached alongside any new supporting evidence. DS2 have provided a written response (16 January 2026) which states the key assumptions where there is divergence are:
- Benchmark Land Value – Premium
  - Purchaser's Costs
  - Commercial Revenue
  - Launch Costs
  - CIL

### **Purpose**

- 1.11 This document will consider the updated information provided by DS2 as part of their January letter to assess whether this effects the conclusion made within the GLA assessment from November 2025.
- 1.12 The note also considers the government's recent clarifications regarding the use of S73 as a means for revisiting scheme viability, and the relevance of this for determination of the application.
- 1.13 This report has been prepared to inform the determination of the application as part of the GLA Stage 2 Referral process. Please read this document in conjunction with the Stage 1 GLA viability comments dated 14 August 2025 and the GLA addendum response dated 28 November 2025.

## 2. Planning Approach

### Section 73

- 2.1 On 23 October 2025 the Secretary of State for Housing, Communities and Local Government released a Written Ministerial Statement (WMS)<sup>1</sup> stating that “Government intends to clarify the use of Section 73 of the Town and Country Planning Act 1990 so that an application under this section to vary a condition of a planning permission should no longer be used as an alternative means of reconsidering fundamental questions of scheme viability or planning obligations.” (emphasis added)
- 2.2 Subsequently on 16 December 2025 the Minister of State for Housing and Planning wrote a letter<sup>2</sup> to the Chief Executive of the Planning Inspectorate regarding the use of S73 applications. The letter notes that “attempts to revisit fundamental issues of viability or planning obligations through Section 73 applications should be scrutinised carefully, and the applicant should provide a robust justification for any changes proposed for planning obligations associated with the original permission beyond those linked to the specific variation of condition being sought.” (emphasis added). This is also referenced in the current NPPF consultation document.<sup>3</sup>
- 2.3 The principle set out in both the WMS, the subsequent letter to the Planning Inspectorate from the Minister of State for Housing and Planning and the NPPF consultation is that S73 should not in principle be used to “fundamentally” revisit issues of scheme viability to change the level of affordable housing and where there is an attempt to do so that the applicant should provide a “robust justification” for any changes sought to planning obligations.
- 2.4 A relevant appeal decision which should also be taken into account when considering the application is the S73 application at 158-160 Pentonville Road in Islington (PINS ref 3354825), where the Inspector addressed the changes to the macro-economic circumstance, the submission of the s73 application and the changes to the affordable housing contribution through the submission of viability assessments (paragraphs 27-49). In regard to the use of viability assessment in a s73 application, paragraph 46 of the decision concluded that: “It has not been demonstrated that there have been changes to macro-economic conditions, since the original grant of planning permission or the adoption of the SDMP, sufficient to justify a site-specific viability assessment.”
- 2.5 In the case of Berol Quarter, since the February 2025 consent and the April 2025 FVA submission market conditions have not materially worsened. Given this, we do not consider that there is a robust justification for fundamentally revisiting issues of schemes viability through use of S73 in this case as required by government in their correspondence to the Inspectorate and development sector.

### Planning Balance

- 2.6 The December letter from the Minister of State for Housing and Planning also sets out that “where developers submit a Section 73 application that seeks to reduce affordable housing provision based on a new viability assessment, the decision maker should have regard to the harm that such a reduction may cause and give this appropriate weight in the overall planning balance, alongside the wider merits of the scheme.” (emphasis added)

<sup>1</sup> <https://questions-statements.parliament.uk/written-statements/detail/2025-10-23/hcws991>

<sup>2</sup> Letter from Minister of State for Housing and Planning to the Planning Inspectorate: Modifying planning obligations

<sup>3</sup> National Planning Policy Framework: proposed reforms and other changes to the planning system

- 2.7 Paragraphs 6.4.10-6.4.13 of the council's planning committee report dated 3 July 2023 for the extant permission stated that 60 affordable homes would be secured, which would make a significant contribution to the delivery of intermediate affordable housing including family homes, and concluded that the proposal would provide "significant public benefits" in terms of housing. (emphasis added)
- 2.8 The Council should reconsider the planning balance of the proposed development in the s73 application, ahead of the stage 2 referral.

### **3. Assumptions Update**

#### **Benchmark Land Value - Premium**

- 3.1 CJ as part of their initial assessment discounted the yield from 6.5% to 7%. This was adopted by DS2 in their September response to arrive at an EUV of £7,215,000. This was adopted within the GLA appraisal of the application.
- 3.2 CJ whilst initially applying a 10% premium revised it to 20% to reflect that the asset is income producing. This equated to a BLV of £8,658,000.
- 3.3 The GLA have adopted a 10% premium to date noting the fragmented occupancy of the asset. DS2 as part of their January report have provided further evidence confirming that the asset is 84% occupied with leases extending to 2034. Following review of the applicant's schedule of lease and given the high level of occupancy at the existing asset the GLA will accept a 20% premium and therefore a BLV of £8,658,000.

#### **Build to Rent Purchaser's Costs**

- 3.4 DS2 to date have adopted an allowance of 6.8% for purchaser's costs, stating that the appraisal should reflect the full purchaser's costs as standard assumption which would be reflected for an asset on a landowner's balance sheet.
- 3.5 CJ also adopted the same allowance but retained the 3% allowance as a sensitivity analysis.
- 3.6 DS2 have adopted a 3-month period for gateway 3 sign off post PC during which time occupancy cannot take place. Following this it is assumed that the asset is disposed of based upon a net yield. Given the appraisal to date has included disposal of the asset post PC, GLA officers accept for the purpose of the review mechanism purchaser's costs of 6.8%.

#### **Commercial Revenue**

- 3.7 DS2 have assumed commercial income of £25.00/sqft whilst CJ and the GLA to date have adopted income of £27.50/sqft.
- 3.8 DS2 as part of their January response have provided lease evidence of a recent letting at the Gessner building (14,500 sqft) which was described by DS2 as being let for £145,000 after an 18-month rent free period. This does however does not align with the information provided by DS2 as part of their September response which states that the same space at the Gessner had been let at £14.50/sqft.
- 3.9 The Carter Jonas valuation was based upon the Applicant's own agent evidence, and as part of their previous response (October 2025) remained satisfied that despite the letting at the

Gessner Building their rental tone sits reasonably within the range of that evidence. GLA officers remain of the opinion that an allowance that an allowance of £25.00-£27.50/sqft is within the range of achievable value given comparable lettings locally. Given the minor difference in assumption, the GLA appraisal will apply a rate of £25.00/sqft in the appraisal of the application.

### **Launch Costs – Build to Rent**

- 3.10 DS2 remains of the opinion that a 1% marketing fee should be allowed for the marketing of the BTR scheme. This is not accepted by Carter Jonas who advised that they have already accepted a higher OPEX allowance to account for the marketing fee for the BTR component. A site mobilisation allowance of £1,000 per unit (£210,000 in total) has been adopted by Carter Jonas.
- 3.11 To date, no itemised breakdown has been provided for the “launch costs”.
- 3.12 DS2 state within their January letter that the “development will provide an operator with an empty building” and that the “construction cost plan excludes any of the FFE needed to enable the building to operate or furnish the amenity areas.” However, we note that the Calford Seaden elemental cost plan (7 February 2025) supporting the applicant’s FVA does in fact include an allowance of £4.2m (£177/sqm or £20,071/unit) for furniture, fittings and equipment, specifically including a CAT A fit out allowance to communal and circulation areas. The development on completion will therefore not be an “empty building” as FFE is not excluded from the cost plan. Given this alongside the increased OPEX allowance we do not consider this assumption to be reasonable.

### **CIL**

- 3.13 DS2 as part of their January letter have provided a copy of the Charging authority’s CIL liability notice equating to:
- MCIL: £1,906,349
  - Local CIL: £2,828,364
- 3.14 We note the letter is dated 04 March 2025. Subsequently the LPA have confirmed that following a review the revised figures are:
- MCIL: £1,905,709
  - Local CIL: £2,828,364

## **4. Viability Outputs**

- 4.1 The DS2 January letter is accompanied by an updated argus appraisal which shows that the scheme achieves a negative RLV of £6,342,947 which compared to the BLV of £8,658,000 equates to a deficit of £15,000,947. When compared to the target return of £18,717,343 it means that the application, based upon the DS2 assessment is achieving an outturn profit of £3,736,396 (2.75% on Net Development Value).
- 4.2 DS2 have stated that the applicant is willing to progress with the application despite the depressed current day return because they expect the scheme to benefit from rental growth and some yield compression.

- 4.3 DS2 have provided sensitivity analysis as part of their January letter which sets out that the scheme would require a minimum of a three point improvement in yield alongside a 9% increase in base rents for this scheme to meet the target return. DS2, despite the request at the meeting on 06 January, have not provided any forecasting data or historic trends to demonstrate that these changes are reasonable and therefore that the scheme is deliverable.
- 4.4 Based on the assessment above, it appears that the scheme would only be viable with significant changes in market conditions through both a reduction in investor appetite and significant rental growth.

## 5. GLA Appraisal Output

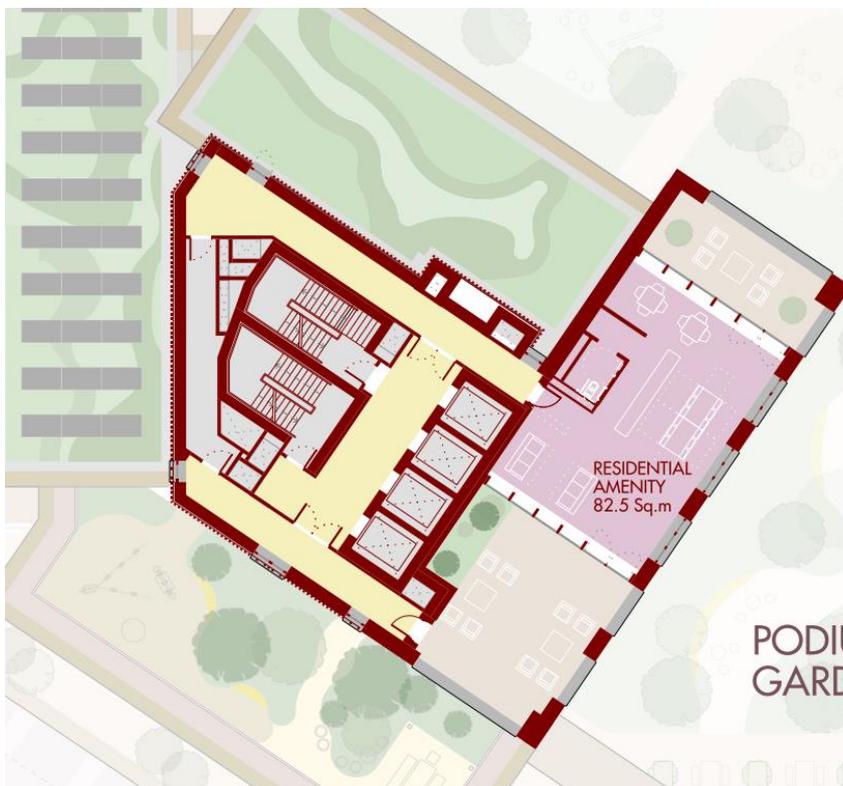
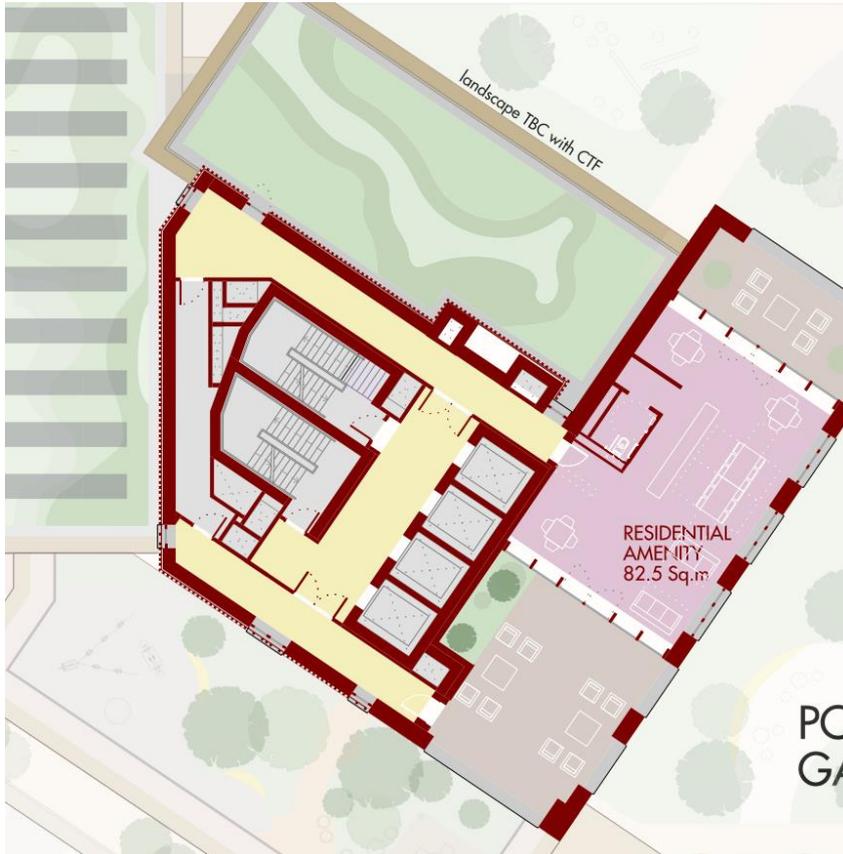
- 5.1 The updated appraisal shows that the proposed development, when assessed on a current day basis with no affordable housing, that a negative RLV of £3,485,238 is generated against a BLV of £8,658,000 meaning that a deficit of £12,053,2388 remains as part of the application demonstrating that the proposal with nil affordable housing is not financially viable.

## 6. Conclusion

- 6.1 After obtaining planning consent in February 2025 for a Fast Track scheme the applicant submitted a S73 application to vary the affordable housing offer to 0%.
- 6.2 Following viability testing from both the applicant, LPA and GLA it has been concluded that affordable housing is not deliverable as part of the application based upon the assumptions presented. The Applicant via DS2 have shown that the scheme would require a minimum of a three point improvement in yield alongside a 9% increase in base rents for this scheme to meet the target return and begin to deliver affordable housing.
- 6.3 The scheme should incorporate early and late stage review mechanisms as per Policy H5 of the London Plan. For the mechanisms to be effective, a series of key assumptions need to be agreed at application stage. The assumptions are all agreed by each party as part of this application, enabling the reviews to be effective.
- 6.4 Recently government, through a Written Ministerial Statement and letter to the planning inspectorate, has sought to address the use of S73 to stop it being used as an alternative means of reconsidering fundamental questions of scheme viability or planning obligations.
- 6.5 As part of this government have set out that where S73 is being used to reduce affordable housing that the decision maker should have regard to the harm that such a reduction may cause and give this appropriate weight in the overall planning balance. This is particularly relevant to Berol Quarter where the LPA as part of the 2025 consent gave "significant public benefits" delivered as part of the scheme through the supply of housing.
- 6.6 Given this, decision makers should consider the recent Written Ministerial Statement regarding the use of S73 alongside the updated viability position and sensitivity testing when determining the planning application.

**Appendix 16:**

HGY/2025/0930 first and original proposal (HGY/2023/0261) 2<sup>nd</sup>:



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<b>Report for:</b>	<b>Planning Sub Committee Date: 05 February 2026</b>	<b>Item Number:</b>	
<b>Title:</b>	<b>Update on major proposals</b>		
<b>Report Authorised by:</b>	<b>Rob Krzyszowski</b>		
<b>Lead Officer:</b>	<b>John McRory</b>		
<b>Ward(s) affected:</b>  <b>All</b>	<b>Report for Key/Non Key Decisions:</b>		

## **1. Describe the issue under consideration**

- 1.1 To advise the Planning Sub Committee on major proposals. These are divided into those cases that have been approved; those cases awaiting the issue of the decision notice following a committee resolution; applications that have been submitted and are awaiting determination; and proposals which are being discussed at the pre-application stage. Information on any current major planning appeals is also included.

## **2. Recommendations**

- 2.1 That the report be noted.

## **3. Background information**

- 3.1 Member engagement in the planning process is encouraged and supported by the National Planning Policy Framework 2024 (NPPF). Haringey achieves early member engagement at the pre-application stage through formal briefings on major schemes. The aim of the schedule attached to this report is to provide information on major proposals so that members are better informed and can seek further information regarding the proposed development as necessary.

## **4. Local Government (Access to Information) Act 1985**



- 4.1 Application details are available to view, print and download free of charge via the Haringey Council website: [www.haringey.gov.uk](http://www.haringey.gov.uk). From the homepage follow the links to 'planning' and 'view planning applications' to find the application search facility. Enter the application reference number or site address to retrieve the case details.

Site	Description	Timescales/comments	Case Officer	Manager
<b>APPLICATIONS DETERMINED AWAITING 106 TO BE SIGNED</b>				
<b>Warehouse Living proposal – 341A Seven Sisters Road / Eade Rd N15</b>  <b>HGY/2023/0728</b>	Construction of two new buildings to provide new warehouse living accommodation (Sui Generis (warehouse living)), ground floor café/ workspace (Use Class E) and associated waste collection and cycle parking. Erection of 10 stacked shipping containers (two storeys) to provide workspace/ artist studios (Use Class E), toilet facilities and associated waste collection and cycle parking. Landscape and public realm enhancements including the widening of and works to an existing alleyway that connects Seven Sisters and Tewkesbury Road, works to Tewkesbury Road, the creation of rain gardens, greening, seating, signage and artworks and all other associated infrastructure works, including the removal of an existing and the provision of a new substation to service the new development.	Members resolved to grant planning permission subject to the signing of legal agreement.  Negotiations on legal agreement are ongoing.	Phil Elliott	John McRory
<b>Capital City College Group, Tottenham Centre) N15</b>  <b>HGY/2024/0464</b>	New Construction and Engineering Centre, extending to 3,300 sq. m	Members resolved to grant planning permission subject to the signing of legal agreement.  S106 agreed and awaiting return from the Applicant	Roland Sheldon	John McRory

<p><b>39, Queen Street, London, Tottenham, N17</b></p> <p><b>HGY/2024/1203</b></p>	<p>Redevelopment of Site for industrial and warehousing purposes (within Use Classes E(g)(ii), E(g)(iii), B2 and B8, with ancillary office accommodation together with access, service yard, car and cycle parking, landscaping, construction of a new substation, boundary treatments and other related works including demolition.</p>	<p>Members resolved to grant planning permission subject to the signing of legal agreement.</p> <p>Negotiations on legal agreement are ongoing.</p>	<p>Sarah Madondo</p>	<p>Tania Skelli</p>
<p><b>157-159, Hornsey Park Road, London, N8</b></p> <p><b>HGY/2024/0466</b></p>	<p>Demolition of existing structures and erection of two buildings to provide residential units and Class E floorspace; and provision of associated landscaping, a new pedestrian route, car and cycle parking, and refuse and recycling facilities.</p>	<p>Members resolved to grant planning permission subject to the signing of legal agreement.</p> <p>Negotiations on legal agreement are ongoing.</p>	<p>Valerie Okeiyi</p>	<p>John McRory</p>
<p><b>27-31 Garman Road, N17</b></p> <p><b>HGY/2023/0894</b></p>	<p>Erection of two replacement units designed to match the original units following fire damage and demolition of the original units</p>	<p>Members resolved to grant planning permission subject to the signing of legal agreement.</p> <p>Negotiations on legal agreement are ongoing.</p>	<p>Sarah Madondo</p>	<p>Tania Skelli</p>
<p><b>International House, Tariff Road, Tottenham, N17</b></p> <p><b>HGY/2024/1798</b></p>	<p>Demolition of the existing industrial buildings and the erection of a new four-storey building of Use Class B2 with ancillary offices and an external scaffolding storage yard (Use Class B8) with associated parking and landscaping.</p>	<p>Members resolved to grant planning permission subject to the signing of legal agreement.</p> <p>Negotiations on legal agreement are ongoing.</p>	<p>Eunice Huang</p>	<p>Tania Skelli</p>
<p><b>13 Bedford Road, N22</b></p>	<p>Demolition of the existing building and the erection of a new mixed-use development up to five storeys high with commercial uses (Use</p>	<p>Members resolved to grant planning permission subject to the signing of legal agreement.</p>	<p>Valerie Okeiyi</p>	<p>John McRory</p>

<b>HGY/2023/2584</b>	Class E) at ground level, 12no. self-contained flats (Use Class C3) to upper levels and plant room at basement level. Provision of cycle parking, refuse, recycling and storage. Lift overrun, plant enclosure and pv panels at roof level.	Negotiations on legal agreement are ongoing.		
<b>37-39 West Road, Tottenham, London, N17</b> <b>HGY/2025/0617</b>	Demolition of all buildings and structures and the construction of single speculative building for flexible B2 general industrial, B8 storage and distribution, and E(g)(iii) light industrial uses with ancillary office, associated service yard, access point, car parking, and landscape planting.	Members resolved to grant planning permission subject to the signing of legal agreement.  Negotiations on legal agreement are ongoing.	Sarah Madondo	Tania Skelli
<b>Newstead, Denewood Road, N6</b> <b>HGY/2024/2168</b>	Erection of three buildings to provide 11 residential dwellings, amenity space, greening, cycle parking and associated works	Members resolved to grant planning permission subject to the signing of legal agreement.  Negotiations on legal agreement are ongoing.	Roland Sheldon	John McRory
<b>312 High Road, Tottenham, N15</b> <b>HGY/2024/3386</b>	Refurbishment, conversion, and extension of the existing building, construction of two single storey buildings to the rear. Commercial use on part of the ground floor and self-contained residential uses on upper floors to provide short stay emergency accommodation.	Members resolved to grant planning permission subject to the signing of legal agreement.  Negotiations on legal agreement are ongoing.	Kwaku Bossman-Gyamera	Tania Skelli
<b>505-511 Archway Road, Hornsey, N6</b> <b>HGY/2025/1220</b>	Redevelopment of existing car wash site to provide 16 new council homes comprising a 4-storey building fronting Archway Road and two 2-storey houses fronting Baker's Lane, with	Members resolved to grant planning permission subject to the signing of legal agreement.	Mark Chan	Matthew Gunning

	associated refuse/recycling stores, cycle stores, service space, amenity space and landscaping.	Negotiations on legal agreement are ongoing.		
<b>Drapers Almshouses, Edmansons Close, Bruce Grove, N17</b>  <b>HGY/2022/4319 &amp; HGY/2022/4320</b>	Planning and listed building consent for the redevelopment of the site consisting of the amalgamation, extension and adaptation of the existing Almshouses to provide family dwellings; and creation of additional buildings on the site to provide of a mix of 1, 2 and 3 bedroom units.	Members resolved to grant planning permission subject to the signing of legal agreement.  Negotiations on legal agreement are ongoing.	Gareth Prosser	John McRory
<b>Timber merchants, 289-295 High Road, Wood Green, N22</b>  <b>HGY/2025/1769</b>	Demolition of the existing (B8) buildings and structures and erection of three residential (C3) buildings of three to five storeys comprising 36 new residential units, with landscaping including child play space, cycle parking, parking, removal of 8 trees and planting of 14 trees.	Members resolved to grant planning permission subject to the signing of legal agreement.  Negotiations on legal agreement are ongoing.	Samuel Uff	John McRory
<b>APPLICATIONS SUBMITTED, TO BE DECIDED</b>				
<b>Berol Quarter, Ashley Road, Tottenham Hale, N17</b>  <b>HGY/2025/0930</b>	Section 73 application to alter drawings to show inward opening doors at the roof level of 2 Berol Yard and alter the permitted level of affordable housing.	To be reported to Members for a decision on 5 <sup>th</sup> February 2026 Planning Sub Committee	Philip Elliott	John McRory
<b>Mallard Place 1 Mallard Place Wood Green N22</b>  <b>HGY/2025/3217</b>	Demolition of existing buildings to deliver a new development comprising affordable housing (Use Class C3) and flexible workspace (Use Class E) alongside public realm improvements, soft and hard landscaping.	To be reported to Members for a decision on 5 <sup>th</sup> February 2026 Planning Sub Committee	Valerie Okeiyi	John McRory

<b>Former Car Wash, Land on the East Side of Broad Lane, N15</b>  <b>HGY/2023/0464</b>	Construction of a new office block, including covered bin and cycle stores.	Application submitted and under assessment.	Sarah Madondo	Tania Skelli
<b>15-19 Garman Road, Tottenham, N17</b>  <b>HGY/2024/3480</b>	Outline planning permission for the demolition of the existing industrial buildings and redevelopment to provide a new building for manufacturing, warehouse or distribution with ancillary offices on ground, first and second floor frontage together with 10No. self-contained design studio offices on the 3rd floor.	Application submitted and under assessment.	Kwaku Bossman-Gyamera	Tania Skelli
<b>44-48 Garman Road, Tottenham, N17</b>  <b>HGY/2025/1464</b>	Change of use of an existing industrial unit including an external yard to a recycling facility and operating depot.	Application submitted and under assessment.	Kwaku Bossman-Gyamera	Tania Skelli
<b>Highgate School, North Road, N6</b>  <b>HGY/2023/0328</b> <b>HGY/2023/0315</b> <b>HGY/2023/0338</b> <b>HGY/2023/0313</b> <b>HGY/2023/0317</b>	1. Dyne House & Island Site 2. Richards Music Centre (RMC) 3. Mallinson Sport Centre (MSC) 4. Science Block 5. Decant Facility	Applications submitted and under assessment. New documents submitted December 2025 and under review.	Samuel Uff	John McRory

<b>Berol Yard, Ashley Road, N17</b> <b>HGY/2023/0241</b>	Section 73 application for minor material amendments	Application submitted and under assessment. Linked to HGY/2023/0261 which has been granted.	Philip Elliott	John McRory
<b>The Goods Yard, 36 and 44-52 White Hart Lane, Tottenham, N17</b> <b>HGY/2025/1298</b>	Full planning application for the temporary change of use to provide car parking and construction compound, including associated works	Application submitted and under assessment.	Philip Elliott	John McRory
<b>THFC Stadium, N17</b> <b>HGY/2025/1405</b>	Plot 5 Reserved Matters for 'appearance' for the residential towers	Application submitted and under assessment. To be determined under delegated powers	Samuel Uff	John McRory
<b>1-6 Crescent Mews, N22</b> <b>HGY/2025/1712</b>	Demolition of the existing buildings and redevelopment of the site to provide 37 residential units in four blocks (comprising a two 3 storey blocks fronting Crescent Mews, a 1 storey block adjacent to Dagmar Road and a 4 storey building to the rear of the site), including 4 accessible car parking spaces, associated landscaping and cycle parking, installation of vehicle and pedestrian access gates and associated works.	Application submitted and under assessment.	Valerie Okeiyi	John McRory
<b>2 To 240 Block, Tiverton Road, N15</b> <b>HGY/2025/3156</b>	Development of the site to provide 17 new residential council homes arranged across two 4-storey blocks; together with associated communal amenity space, private outdoor	Application submitted and under assessment.	Sarah Madondo	Tania Skelli / John McRory

	space, landscaping, cycle parking, and refuse storage			
<b>30-48 Lawrence Road, Tottenham, N15</b> <b>HGY/2025/3108</b>	Alterations and extension to existing building to provide new self-storage facility (Use Class B8), new flexible workspace / incubator units and other works ancillary to the development.	Application submitted and under assessment.	Gareth Prosser	John McRory
<b>IN PRE-APPLICATION DISCUSSIONS</b>				
<b>Clarendon Square/Alexandra Gate Phase 5, N8</b>	Application for approval of reserved matters relating to appearance, landscaping, layout, scale, access, pertaining to Buildings <i>G1, G2, J1, J2 &amp; F1</i> forming Phase 5 of the Northern Quarter, including the construction of residential units (Use Class C3), commercial floorspace and associated landscaping pursuant to planning permission HGY/2017/3117 dated 19th April 2018	Pre-app discussions ongoing.	Valerie Okeiyi	John McRory
<b>Lotus Site / former Jewson Site, Tottenham Lane, N8</b>	Redevelopment of the site at 7-11 Tottenham Lane consisting of the re-provision of employment floorspace at ground floor level and the upwards development of the site to accommodate purpose built student accommodation.	Pre-application discussions ongoing.	Valerie Okeiyi	John McRory
<b>Land in Finsbury Park to the East of Lidl, 269-271 Seven Sisters Rd, N4</b>	New 460 seat theatre and ancillary spaces with cross-funding residential development (potentially up to 15 storey high residential tower) on the edge, within the park itself, of Finsbury Park	Initial pre-app meeting held. Formal written pre-app advice issued.	Samuel Uff	John McRory

<b>Reynardson Court, High Road, N17</b>  <b>Council Housing led project</b>	Refurbishment and /or redevelopment of site for residential led scheme – 18 units.	Pre-application discussions taking place.	TBC	Tania Skelli
<b>680-692 Seven Sisters Road, London, N15 5NF</b>	Redevelopment to provide mixed use commercial (854sqm GIA) and co-living (229 units/9,778sqm GIA) development (equates to 127 homes at a ratio of 1.8:1 as per London Plan)	Initial pre-app meeting took place early January 2026.	Phil Elliott	John McRory
<b>Ashley House and Cannon Factory, Ashley Road, N17</b>	Part 9, 10, and 25 storey PBSA building with 581 rooms, part 7, part 8, and part 19 storey Co-Living building with 506 rooms, and a 6-storey block of 88 affordable homes with commercial/employment/community spaces and landscaping and new public realm.	Initial pre-application meeting took place late November 2025.  Response issued early Jan.  PPA being negotiated.	Phil Elliott	John McRory
<b>Bernard Works</b>	Seeking to add phasing of development to planning approval HGY/2017/3584	NMA and DoV to S106 under negotiation.	Samuel Uff	John McRory
<b>YMCA, 184 Tottenham Lane, Hornsey, N8</b>	Redevelopment of the site to provide approx. 170 bed spaces , configured into cluster flats and 'move-on' flats to meet an identified need, as well as communal spaces, support facilities and ground floor spaces for residents.	Pre-application meetings held in August and November 2025 - preapplication note has been issued. QRP in December 2025. Ongoing PPA in place.	Phil Elliott	John McRory
<b>28-42 High Road, Wood Green, N22</b>	Demolition of existing buildings for co-living accommodation (Sui Generis) led scheme of circa 400 units and 854 sqm of commercial (Use Class E) floorspace	Formal written advice issued May 2025. Extant permission HGY/2018/3145 was approved for circa 200 dwellings for wider site 22-42 High Road. Part of	Samuel Uff	John McRory

		that site is CR2 safeguarded. This proposes alternative development on part of the site.		
<b>Wood Green Central, N22</b>	Initial discussions for Station Road sites designated as SA8 of the Site Allocations Development Plan Document (DPD).	Preapp meetings held. Discussion of heights, uses, siting and relationship to adjacent site allocations. Note issued. QRP reviewed.	Samuel Uff	John McRory
<b>Lynton Road, N8 (Part Site Allocation SA49)</b>	Demolition/Part Demolition of existing commercial buildings and mixed use redevelopment to provide 75 apartments and retained office space.	Pre-app discussions ongoing.	Gareth Prosser	John McRory
<b>1 Farrer Mews, N8</b>	Proposed development to Farrer Mews to replace existing residential, garages & Car workshop into (9 houses & 6 flats).	Discussions ongoing as part of PPA.	Benjamin Coffie	John McRory
<b>CURRENT APPEALS</b>				
<b>Site</b>	<b>Description</b>	<b>Type of Appeal</b>	<b>Case Officer</b>	<b>Manager</b>
No major appeals currently on hand				

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