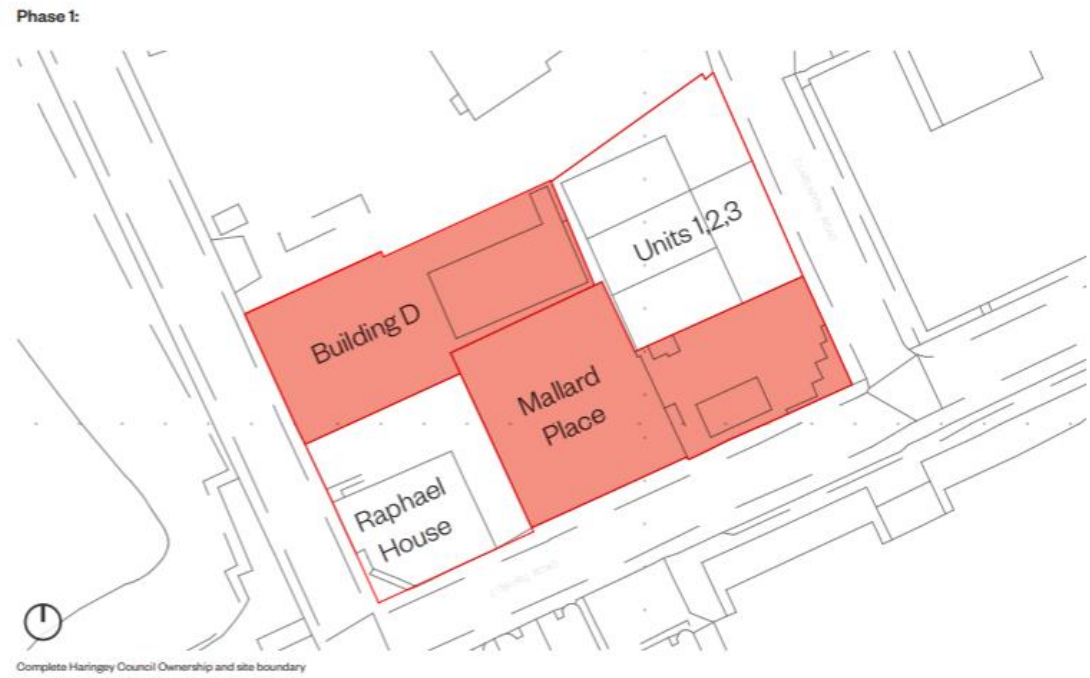
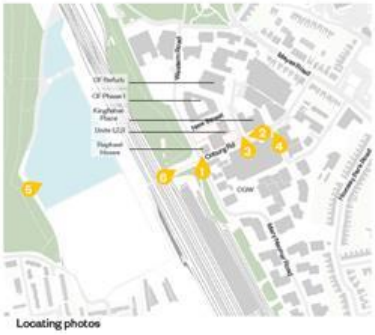
APPENDIX 2 – PLANS AND IMAGES



Site location plan

Birds eye view

SITE ANALYSIS
EXISTING CONTEXT



Locating photos


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


02. The Site: Approach from Coburg Road and Units 1,2,3


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

Proposed ground floor plan

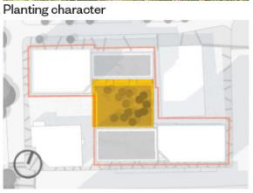
Proposed first floor plan

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

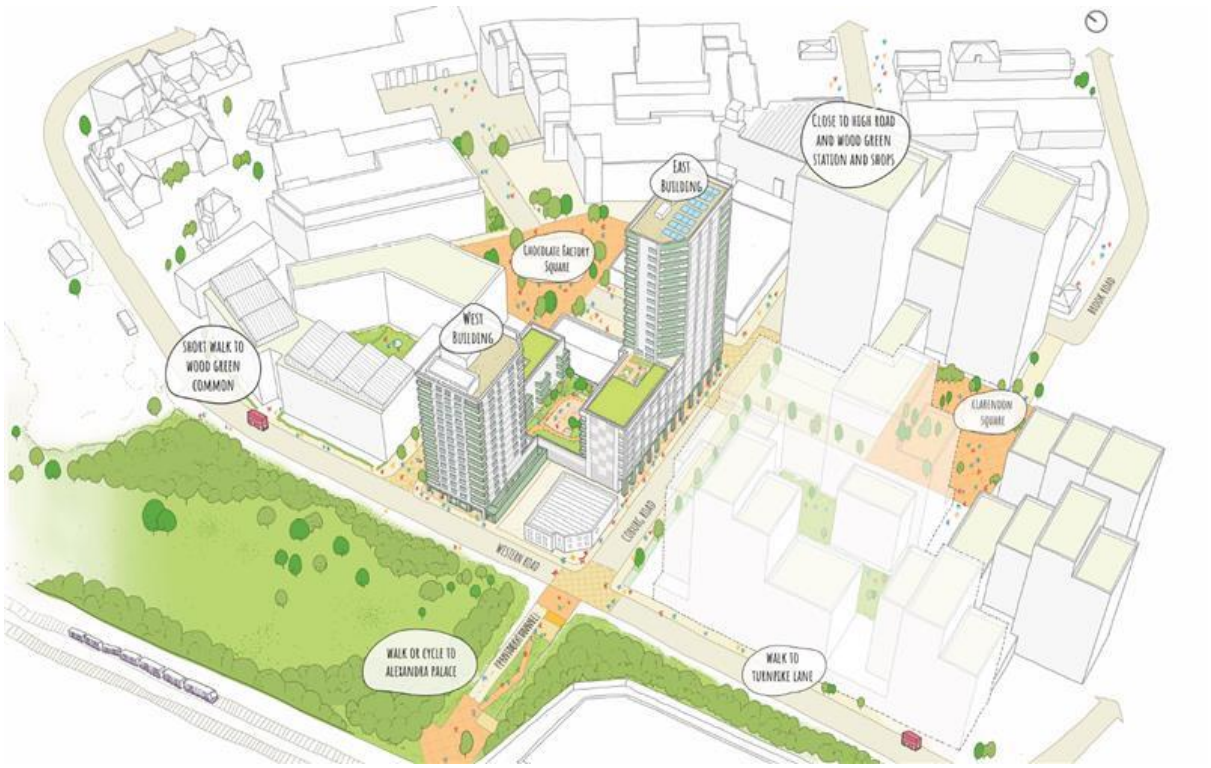
View from the Penstock Tunnel route

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 REPONSES – INTERNAL AND EXTERNAL

Stakeholder	Question/Comment	Response
Design	*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 (Housing Procurement) Agent: Iceni Projects Architects: Levitt Bernstein Architects **Contents** Principle of Development and Site Allocations ..... 14 Location and Neighbouring Sites ..... 15 Height, including Tall Buildings ..... 17 Form, Bulk & Massing ..... 22 Urban Form & Streetscape ..... 23 Elevational Composition, Fenestration & Balconies ..... 25 Materials & Detailing ..... 26 Private and Communal Amenity Spaces, including Children's Playspace ..... 27 Residential Quality, including Aspect and Privacy ..... 27 Daylight and Sunlight ..... 29 Summary & Conclusions 32	Comments noted Conditions included

	Principle of Development and Site Allocations 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. 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. 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. 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: - 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 reprovided. - 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 AAP - Clarendon Rd will be enhanced and provide a north-south pedestrian and cycling connection through the site. - 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 - 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. 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. Location and Neighbouring Sites 6. The site consists *of most* 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	

	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). 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. 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 $^{2}/_{3}$ of the site allocation, comprising of 10,657m^{2} of commercial floorspace and 230 residential homes (Known as Chocolate Factory Phase 1), and a masterplan without floorspace for the remainder. 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 1st 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. 10. Subsequent to permission being granted, Block D and $^{2}/_{3}$ 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	

	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 th 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 ne Local Pans 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 Polices DPD (adopted 2013 (with alterations 2017) and DM6 of our Development Management DPD (adopted 2017):	

	• 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. • HGY SP11: *assessment supporting tall buildings in a Characterisation Study"* - 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. • LP D9.C.1 a): *"development proposals should address … visual impacts"* [long, mid & immediate views]; HGY DM DPD DM6.B.a: *"Protect and preserve existing locally important and London wide strategic views in accordance with Policy DM5"* – 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.	

	• LP D9.C.1 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";* 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. • LP D9.C.1 b): *"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";* HGY DM DPD DM6.B.a: *"be of a high standard of architectural quality and design, including a high quality urban realm"; 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 • LP D9.C.1 c): *"proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings…"* - 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. • LP D9.C.1 g): *"buildings should not cause adverse reflected glare"* – 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. • LP D9.C.1 h): *"buildings should be designed to minimise light pollution from internal and external lighting"* – again, given they will be in domestic use and not all window should not be a concern. • LP D9.C.2 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"* – 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.	

	• LP D9.C.2 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"* – Servicing has been carefully thought about and designed with care, with ground and 1st (under podium) floor refuse, cycle and plant storage. • LP D9.C.2 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 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. • LP D9.C.2 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 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. • LP D9.C.2 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 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. • LP D9.C.2 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"* – 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	

	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. • LP D9.C.3 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, including water spaces, around the building"* – The applicants' consultants have carried out extensive wind testing on computer and in laboratories, along with detailed daylight and sunlight assessment as detailed elsewhere. • LP D9.C.3 b): *"air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions"* – The site is not a heavily trafficked location, away from any immediately neighbouring busy roads or other pollution sources. • LP D9.C.3 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"* – There have been no suggestions that there would be any adverse wind generated noise around these proposed buildings. • LP D9.C.4 a): *"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"* – no cumulative issues considered relevant. • LP D9.D: *"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".* – again, given they will be in domestic use, not relevant. • *HGY DM DPD DM6.C.b: "Consider the impact on ecology and microclimate" -* 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.	

	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, whey 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 3rd and 4th 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	

	two large ground floor workspace units, the generously proportioned main residential communal lobby and a smaller but stills spacious lobby to the 1st 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 1st floor of the arcade will be fully glazed onto the 1st 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. 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. 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. 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 1st 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. 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	

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 logia 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 ain 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 2nd floor podium garden and two smaller private communal roof terraces, at 6th floor on the northern block and at 8th 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.	

	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. 40. The proportion of single aspect housing is exceptionally low, with just one single aspect flat, where there is a 1st floor flat over ground floor refuse storage, facing the new residential street. This number is considered an exceptionally good achievement. 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 logia 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. 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. 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	

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 6th floor roof terrace, and a living room and kitchen facing the 8th 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 2nd or 3rd, 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

	greater benefit to residents. Nevertheless, given the higher density nature of this development area, the result is considered a good daylighting performance. 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. 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. 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. 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 & J) of Alexandra Gate. The	

	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. 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 pars 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). 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&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. 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.	

	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. 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. 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. Summary & Conclusions 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	

	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. 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. 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. 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. 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. **Richard Truscott** **Urb** **an Design Officer**	
Conservation	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

	Area that are located to the immediate west of the Great Northern Railway Line just opposite to the proposed development. 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. 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. 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. 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	

	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. 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.	
Transport	**Transportation Planning comments** **HGY/2025/3217 – 1 Mallard Place, Mallard Place** **Description** 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. **Location and access**	Observations have been taken into account. The Recommend legal agreement clauses and conditions will be included in line with the planning obligations SPD

	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 51Education 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 1st 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	

	development be completed before New Street is operational) and in the longer term/final arrangements. The servicing and delivery strategy for the site encompasses the following: 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. 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. 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. 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. 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. 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. **Site Access and wayfinding (Active Travel Zones)** 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: ATZ Route 1: Noah's Ark Day Nursery Wood Green, Caxton Gardens, Station Road bus stops and Wood Green Underground Station. ATZ Route 2: Morrisons, The Community Hub and Wood Green Faith Mosque. 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.	

	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)**	

	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). 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. 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: • Provision of long-stay residential cycle parking at ground floor level (at very least the accessible cycle parking). • Provision of a to be agreed proportion of dockless cycle hire cycles. • Provision of cycle hangars. • Provision of Brompton bike hire. An appropriate financial contribution towards provision of any of the above maybe sought by the authority. 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 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. **3. Disabled/accessible parking bays** 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:	

	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. 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. **S.106 agreements** 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. **1. Car-free development** 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. 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. **2. Car Parking Management Plan.** <u>The applicant will be required to provide a Car Parking Management Plan which includes but is not limited to:</u> <u>a)</u> 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. 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.	

	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/dop-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: o Deliveries, waste, cranes, equipment, plant, works, visitors; o Size of construction vehicles; o The use of consolidation operation/centre or scheme for the delivery of materials and goods. o 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):	

	○ Programming; ○ Waste management including using waste compaction; ○ Construction/demolition methodology; ○ Shared deliveries; ○ Reverse/green logistics strategies to be employed; ○ Car sharing; ○ Travel planning; ○ Local workforce; ○ Parking facilities for staff and visitors; ○ On-site facilities; ○ A scheme to encourage the use of public transport and active travel. • Routes for construction/demolition traffic avoiding weight and size restrictions to reduce unsuitable traffic on residential roads; • Locations for loading/unloading, waiting/holding areas and means of communication for delivery vehicles if space is unavailable within or near the site; • Mechanisms in place to deal with unexpected/late delivery vehicles to minimise queuing impact and any idling on the highway network; • Locations for storage of plant/waste/construction/demolition materials; • 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); • Arrangements to receive abnormal loads, unusually large vehicles, the delivery of cranes, portacabins and specialist plant; • Swept path analysis showing access for the largest vehicles expected to regularly access the site and measures to ensure adequate space is available; • Any necessary traffic management measures such as the suspension of parking, loading, one way working, footway and road closures, portable signals, stop & go, lane closures, contraflow, priority working and give & take;	

	• 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; • Measures to protect vulnerable road users (cyclists and pedestrians) such as hoarding; • Measures to protect street furniture such as lighting columns and traffic signs; • 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; • Membership of the Fleet Operator Recognition Scheme (FORS). • Meets the Construction Logistics and Community Safety (CLOCS) silver standard and demonstrates a commitment to strive to secure gold standard; • Methods of communicating the Construction/Demolition Management Plan to staff, visitors and neighbouring residents and businesses. The plan shall include a plan which identifies where required: • Hoarding lines with access gates (vehicle, pedestrian and cyclists). • Pedestrian, cycle and vehicle routing in to and within the site. • Temporary traffic management measures (including footway and road closures) and traffic marshal/banksman locations. • Locations for the loading/unloading, waiting/holding areas and storage of plant, waste and construction/demolition materials. • Crane and site welfare portacabin locations. • Parking (vehicle and cycle). Prior to the installation of traffic management measures on traffic sensitive streets the location, date and time must be agreed by the Highways Authority. 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:	

	• 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.	

	We are seeking a contribution of £40,000 (Forty thousand pounds) towards the design and development of the improvement scheme. Reason: To conform to London Plan Policy T2 Healthy Streets. To encourage active travel choices to/from the development site. **S.278 Agreements** 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. 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. 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. Reason: To implement the proposed highways works to facilitate future access to the development Site and to protect the integrity of the highways network.	

Lead Pollution	. 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. 1. Land Contamination Before development commences other than for investigative work: 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	Comments noted. Conditions /informative included

	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. 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. 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. 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 meets Stage IIIA of EU Directive 97/68/ EC for both NOx 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 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	

	Planning Authority. 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. Informative: 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.	
Carbon Team	**Carbon Management Response 22/12/2024** In preparing this consultation response, we have reviewed:	Comments noted. Conditions and legal agreement Clauses included

- 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_2 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_2 from a baseline of 135.39 tCO_2/year.

Sitewide (SAP10.2 emission factors)

	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Part L 2021 baseline	135.39		
Be Lean	102.32	33.07	24%
Be Clean	102.32	0.0	0%
Be Green	45.96	56.36	42%
Cumulative savings		89.43	66%
Carbon shortfall to offset (tCO_2)	45.96		

Carbon offset contribution	£95 x 30 years x 45.96 tCO_2/year = £130,987
10% management fee	Plus £13,099

Part L 2021	**Residential**			**Non-residential**		
	Total regulated emissions (Tonnes CO_2 / year)	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**	**Total regulated emissions (Tonnes CO_2 / year)**	**CO_2 savings (Tonnes CO_2 / year)**	**Percentage savings (%)**
Baseline	133.7			1.73		
Be Lean	100.9	32.80	25%	1.46	0.27	16%
Be Clean	100.9	0.0	0%	1.46	0.0	0%
Be Green	44.56	56.30	42 %	1.40	0.06	4%
Cumulative savings		89.1	67%			19%

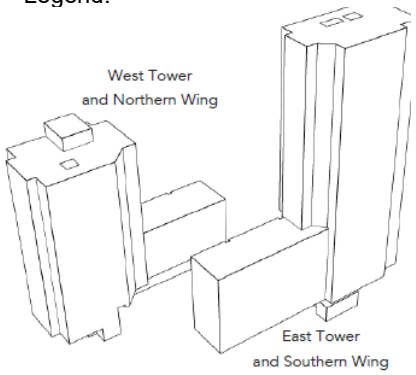
Energy Use Intensity (EUI) / Space Heating Demand (SHD)
Applications are required to report on the total Energy Use Intensity (EUI) and Space Heating Demand (SHD), in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 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^2/year	32 kWh/m^2/year	Meet GLA benchmark of 35/65/55 kWh/m^2/year
SHD	10 kWh/$m^{2\ GIA}$/year	11 kWh/$m^{2\ GIA}$/year	Meets GLA benchmark of 15 kWh/m^2/year
	15 kWh/ $m^{2\ TFA}$/year	14 kWh/ $m^{2\ TFA}$/year	Meet PHPP criteria of <15 kWh/m2 TFA/yr
Methodology used	PHPP and SAP		

* Legend:



Energy – Lean

The applicant has proposed a saving of 33.07 tCO_2 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^2K
External wall u-value	0.15 W/m^2K
Roof u-value	0.10 W/m^2K
Door u-value	1.0 W/m^2K
Window u-value	0.8 W/m^2K
G-value	0.5
Air permeability rate	1 m^3/hm^2 @ 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^2year; East Tower and Southern Wing is 4.6 kWh/m^2year
Low energy lighting	100% LEDs with an efficiency of at last 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^2/year to 21.80 kWh/m^2/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 4th 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. <u>Actions</u>: - 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_2 (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:

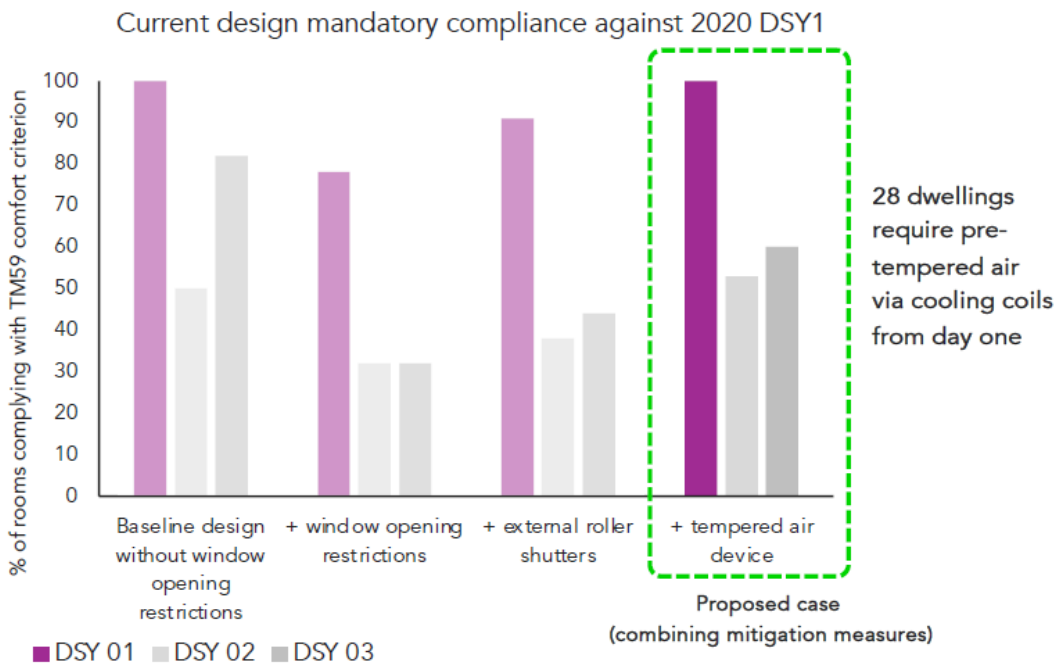
- Please provide the equivalent carbon reduction in tCO_2/year of the renewable electricity generated by the solar PV system.
- How will the solar energy be used on site (before surplus is exported onto the grid)?
- How much of the heating/hot water demand will be met by the proposed types of heat pumps? 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. <u>Actions:</u> - 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_2/year remains. The remaining carbon emissions will need to be offset at £95/tCO_2 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.	

	Residential – TM59: 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. The following scenarios have been modelled under 2020 DSY 1-3, 2050 DSY 1 and 2080 DSY 1 for predominantly naturally ventilated spaces: • Scenario 01 – Baseline design without window opening restrictions • Scenario 02 – Baseline design with window opening restrictions • Scenario 03 – Scenario 02 plus external roller shutters • Scenario 04 – Scenario 03 plus tempered air device Results are shown in graph below (extracted from the OH analysis):	



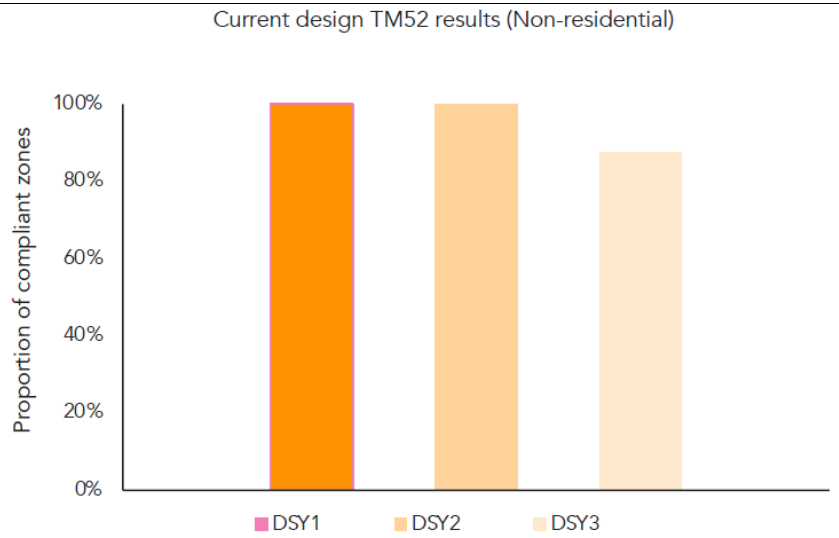
Graph showing residential full compliance against Part O / CIBSE TM59 overheating criteria using 2020 DSY1 London weather files.

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)

	- MVHR (0.55 ACH) - Cooling coils to the MVHR with 1kW cooling capacity1kW tempered air coil added to the MVHR for 28 units - No active cooling 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. 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. **Non-residential – TM52:** The non-residential spaces include the commercial unit and the workspace areas. These areas have been assessed under mechanically conditioned spaces.	



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 widows where possible
- VRF cooling system with cooling capacity of 75W/m^2

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

<u>Actions:</u>

- 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^2) 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:

	Estimated carbon emissions	**GLA benchmark RESIDENTIAL**	**Embodied carbon rating (Industry-wide)**
Product & Construction Stages Modules A1-A5 (excl. sequestration)	709 $kgCO_2e/m^2$	Meets GLA benchmark (<850 $kgCO_2e/m^2$) but misses the aspirational target (<500 $kgCO_2e/m^2$).	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 $kgCO_2e/m^2$ (excl contingency)	Meets GLA target (<1200 $kgCO_2e/m^2$) but misses the aspirational benchmark (<800 $kgCO_2e/m^2$).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'E', not meeting the RIBA 2030 Design Target.
	1217 $kgCO_2e/m^2$ (incl contingency)	Misses GLA target (<1200 $kgCO_2e/m^2$) and aspirational benchmark (<800 $kgCO_2e/m^2$).	Modules A1-B5, C1-4 (incl sequestration) achieve a letter band rating of 'F', not meeting the RIBA 2030 Design Target.
Use and End-Of-Life Stages Modules B6 and B7	5$kgCO_2e/m^2$ *	N/A	
Reuse, Recovery, Recycling Stages Module D	-158$kgCO_2e/m^2$ *	N/A	

** Information extracted from the GLA WLCA assessment spreadsheet*

	The highest embodied carbon in Modules A-C is attributed to the superstructure (50%) and MEP (21%) and finishes (10%). 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. 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. 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: • Replacing early-stage benchmarks with project-specific data • Optimising structural quantities • Improving concrete and steel specifications • Refining calculations against design team quantities. 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. <u>Actions:</u> - Applicant to explain why the embodied carbons from B6 and B7 are so low. - Have applicant identified any project-specific opportunities to reduce WLC in later design stage? - 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? - ***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: - 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. <u>Actions:</u> - 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^2 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 *<u>Energy Strategy</u>* *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. *<u>Sustainability Review</u>* *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.* *<u>Be Seen</u>* *(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.* *<u>Overheating</u>* *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.* *<u>Building User Guide</u>*	

	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.* *<u>Sustainability standards for non-residential unit</u>* *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.* *<u>Living roofs</u>* *(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^2 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^2, 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^2) and density of plug plants planted (minimum 20/m^2 with root ball of plugs 25cm^3) 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.* *<u>Climate Change Adaptation</u>* *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. *<u>Circular Economy</u>* *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, 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.* *<u>Whole Life Carbon</u>* *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.* *<u>Passivhaus Certificate</u>* *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/m2/year is achieved, accompanied by Passive House Planning Package (PHPP) calculations.*	

	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. *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.*	
Flood and Water Management	Comments dated 29/12/2025 Having reviewed the applicant's submitted Flood Risk Assessment and Drainage Strategy document refence number 3765-CIV-XX-XX-R-C-30001 Revision P2 dated 5th November 2025 prepared by Civic Consultant, we have following comments to make on the above full planning application. : 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) 2) For the calculations above, we request that the applicant utilises more up to date FEH rainfall datasets. 3) An evidence from the Thames Water confirming that the site has an agreed rate and point of discharge. 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.	Comments noted Conditions included

	5) Details of the Management and maintenance plan for the installed drainage system in perpetuity as per the above I hope the above is helpful. Please do not hesitate to contact me should you require any further information.	
Trees	Comments dated 19/01/2026 From an arboricultural point of view, I cannot support the above proposal. 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 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. When standing back to view the trees the two canopies give the impression of one overall larger canopy. 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. The immediate surrounding area is void of mature trees. 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.	Comments noted Legal agreement secured

	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. 	

	Comments dated 28/01/2026 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. 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. 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). 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. Please confirm that we can be allocated the full CAVAT loss amount through a S.106 agreement	
Waste Management	Formal Planning Comment – Waste Management (Approval Subject to Conditions) **Application reference:** HGY/2025/3217 **Site:** Mallard Place (Chocolate Factory Phase 2), Wood Green, N22 6TS	Comments noted The Delivery and Servicing Plan condition will address waste collection concerns

	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	

	final OWMS should therefore confirm **weekly residual refuse collection** (and not fortnightly) for the communal system, as collection frequency underpins storage capacity and overflow risk. 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 **Class E commercial/workspace**, the arrangements should demonstrate resilience (e.g., missed collection contingency) and confirm how occupiers/contractors will comply with workplace recycling separation requirements applicable from **31 March 2025**. **Recommendation (Approval with Conditions):** Approve subject to conditions securing (i) a finalised Operational Waste Management Strategy confirming **weekly residential refuse collection** 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.	
Noise Officer	Having looked through the noise assessment I do not have any comments as the proposed data looks agreeable in my opinion.	
EXTERNAL		
Thames Water	Waste Comments: 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	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 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 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 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. 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) 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. 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:	

	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 pilling 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. Please provide and address the following: 1. Development Layout Plan with OS Background 2. Block Piling Layout Plan in relation to TWUL assets. 3. Cross sectional Details to show proximity of proposed piles in relation to TWUL Assets. 4. Piling method and pile type 5. It should be specified on the development sketch how many stories each building has. 6. Will a basement be constructed? Any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. 7.Submit a ground movement contour plot to prove our assets are not falling within the 1mm ground movement contour. Plans of Thames Water apparatus can be obtained through our website at www.thameswater@propertysearches.co.uk. Please contact Developer Services if you wish to discuss further (email at developer.services@thameswater.co.uk with email subject FAO DS- Major Projects Team. Please use the following reference in all future correspondence: DTS 79426.	
Transport for London	Comments dated 19/01/2026 **1 Mallard Place, Coburg Road - TfL's detailed comments** Thank you for consulting TfL with regards to this referable planning application. 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).	Comments noted conditions included Recommend legal agreement clauses and conditions will be included

	The application seeks: 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. Site description and context 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. 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. 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). Chocolate Factory consent and this application 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. Crossrail 2 safeguarding 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	

	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.	

	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. 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. 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. 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. Refuse, Deliveries and Servicing 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 Construction 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. Travel Plan	

	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.	

	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. It appears that most of the matters could be secured through planning conditions. If there's any other planning obligations or conditions with which I can assist please let me know.	
Designing Out Crime Officer		Comments noted. Conditions/Informative included

METROPOLITAN POLICE

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.

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 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

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	
Height	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.
Fencing Material Metal	Metal fabrication, should be robust, have an unfinished top rail (exposed tops), to deter loitering, sitting and climbing.
Railing Fencing	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.
Railing Fencing	Any perimeter boundary treatment (railings) should be between 1.1m and 1.35m - ideally designed to provide visual permeability.
Gating	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.
Recess	Where possible building lines should be flush to allow natural surveillance, any recesses should not exceed 600mm.
Anti- Climb	If anti-climbing measures are introduced then signage should be used to comply with Occupiers Liability Act 1984.
Fencing Type	Any boundary treatments should be UKAS certified as recommended by a DOCO
Low Height boundaries	All low defensive wall/railings to be designed to deter sitting, loitering and climbing.

Access Control	
Access Control	Access control at the pedestrian gate is required to maintain security in communal areas. All panels to have audio/visual capability.
Access Panel	Access control panels (anti-vandal) should achieve the Secured by Design required standard – UL293.
Trades Button	**No** Trades Button on control panel
Audio/Visual Entry (Camera)	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.
Data Retention Fob Access	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*
Integrated (Part B/ ADQ) Compliance	Access control systems should be Integrated to utilise both fire and security systems.
Emergency Release (Push To Exit)	Pedestrian gate should be access controlled for both residents only
Plant Room/ Service Rooms	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 DOCO: 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*
Pedestrian Gates	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.
Internet Of Things (IoT)	Due consideration to be given to the security/risk management to access control systems dependent upon how they interact with IoT.

Fire Access - Gates	
DropKey Protection Box(DPB)	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 https://www.gerdasecurity.co.uk/productsandservices/frs-locking-system/drop-key-protection-box-(dpb).aspx

Doors	
Recessed Areas	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.
Accessible Doors Apartment and Townhouses	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.
Street Opening Front Doors	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.
Residential Door Fittings	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.
Locks	All locks are to be part of the accredited PAS24:2022 specification.

Postal Strategy	
External Secure Mailboxes	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.
Internal Secure Mailboxes	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	
Accessible Windows & Roof Lights	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 throug secure door or not)
Glazed Apertures	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.
Lockable Window Handles	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

	floor, vulnerable and accessible windows must have a lockable window restrictor to prevent unauthorised access.
Access control	
Access Control Layers	Communal entrance to residents door – 1st door Fob access for residents and Audiovisual access control for visitors with free movement in the lifts 2nd lobby door (on resident floor) to be audiovisual (preferred) or audio access control for visitors with fob access for residents Access to cycle stores and podium be agree and must restrict access across the blocks (with the exception of emergency egress) Stair cores are accessed via fob at ground floor with push to exit on each floor and fob onto the floor. All cycle and refuse stores to be accessed via fob
CCTV	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

	Cycle Stores
External Cycle and Bulk Storage	Positioned as not to provide climbing aids to other vulnerable areas such as accessible window/s, door/s, balconies, flat roofs and podiums.
Cycle Storage Lighting	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.
Signage	No signage to be erected externally which would provide opportunity for offenders to identify cycle storage.
Bicycle Registry Management	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.
CCTV	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.
Locking Points	There should be 3 locking points for cycles on the racks/stands provided. Cycle racking should be secured with anti-tamper fixings
Viewing Panel	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).
Internal Signage	Ideally signage should be placed inside the store to reinforce importance of securing cycles

	by residents.

Balconies / Terraces & Door Canopies	
Balconies	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.
Raised Planters	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
Door Canopies	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	
Public Realm lighting	Whether adopted highways/footpaths/private estate roads or car parks should meet BS 5489:2020 standard.
Declaration of Conformity	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.
Internal lighting	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)
Lux levels	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: • Office interior (security) 05 Lux • Private car parks 10 Lux • Exterior Rural location 10 Lux • Exterior Urban location 20 Lux • Walkways 30 Lux • Loading bays 50 Lux Further guidance is available in the "Lighting against crime" manual.
Uniformity (Uo)	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: • Values of between 0.25 and 0.40 • Using lamps with a rating of at least 60 (minimum) on the Colour Rendering Index. • Good lighting will use energy efficient lamps in suitable luminaries.
Dusk-Till-Dawn Lighting	Lighting, where possible should consist of white light which is evenly distributed In Communal areas: • All entrances should have dusk till dawn lighting supported via a photo electric cell. Allowing lighting to controlled automatically. On Residential units: • 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.

Bollard lighting	**Is not permitted under the scheme** due to its history of vandalism and ease of been 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.
Directional lighting	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.

Gates	
Gate/s	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
Ironmongery	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.
Push to Exit	Egress button to be minimum of 1.5 metres away from gate and fully shrouded. Any associated cabling to be out of sight.
Pedestrian Gate/s	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.

Climbing Points	
Rain Water Pipes	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.
Balcony to Balcony vulnerabilities	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.
Balconies and adjacent features	Consider vulnerability of balconies by boundary walls along with • Trees. • Door canopies. • Street furniture. • Neighbouring properties. • ACB and utility meters. • Any outbuildings such as cycle and refuse store. • Vehicles in parking areas.

Utility Meters	
Utility Meters	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.

Management Plan	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.

Car Parking	
Location	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.
Lighting	Should be well lit to the latest standard of BS5489 (consider Park Mark guidance) https://www.britishparking.co.uk/write/Documents/safer%20parking/SPS%20New%20Build%20Guidelines%20-%20web%20version.pdf

Alarm / C.C.T.V	
Alarm Consideration	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. https://www.policesecuritysystems.com/
CCTV Installation	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: • Entrance & exit points including secondary coverage of call points, • Foyer / Lobby areas, • Post boxes and Postal rooms, • Cycle stores, • Refuse stores, • Underground or covered parking areas, • Top of stair cores Due consideration to be given to other areas suitable for CCTV throughout the development as part of a site specific risk assessment. 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.
Quality	Should be of good facial recognition and colour HD quality in both daylight and night vision.
Housing & Signage	CCTV housing to be anti-vandal and potentially shrouded. Signage highlighting use of CCTV should displayed throughout the development.
Storage & Access	• Footage should be preserved for a minimum of 31 days. • Any CCTV system that captures footage of public areas must comply with the regulations outlined by the Information Commissioner's Office. • 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. • Police access to footage must be within a minimum of 24 hours and a maximum of 48 hours for evidential purposes.

Party Walling	
Communal to Apartment Walling Preferred System	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: • LPS1175 (Issue 7.2) SR1 • LPS1175 (Issue 8) SR1/A1 • STS202 Issue 7 BR1
Apartment to Apartment Party Walling Alternative	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. • E-WT-2 Timber Wall • E-WS-3 Light Steel Wall • E-WM-20 Masonry Wall 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	
Permeability	• Routes for pedestrians, cyclists and vehicles must be open, direct and not unnecessarily separated from one another. • 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.
Communal Areas	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.
Playground Areas	Due consideration to be given to child safeguarding including preventing dogs entering, abductions and children walking out unnoticed by guardian/s. Playgrounds should be: • Located to allow natural surveillance from nearby dwellings. • Clear signage stating age restrictions for specific areas and equipment (i.e. under 5's). • Ideally be fully enclosed with 1.2m open top railings or planting, to prevent casual users. • Should be a single dedicated entrance/exit point to enable parent/guardian supervision • Dedicated entrance/exit point to be gated with self-closer. • Ideally designed to be secured at night, if so boundary heights to be raised. • Vandal resistant equipment to be installed. • Historically playgrounds located at the rear of dwellings create ASB flashpoints and where possible should be avoided. • Lighting needs to be a consideration. 24/7 lighting implies a suggestion of use out of hours (Site specific)
Landscaping Scheme	A full landscaping scheme plan should be submitted and discussed with the DOCO.
Sight lines	• Bushes and shrubs maximum 1m high. • Trees should a canopy height of 2m minimum and maintained to allow clear sight lines. • Landscaping and trees, should be designed to complement CCTV or lighting plans with long term maturity a consideration.
Defensive Planting	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: • Plants with flowers for aesthetics and to deflect harsh appearance. • 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. • Positioned beneath windows and next to fences to deter potential offenders. • Require regular maintenance to prevent getting overgrown. • May require signage to warn of risk of injury (Occupiers Liability Act).

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 reduces 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.

- There are no references to crime in the **overarching policies**, although it is recognised that housing and economic polices 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 mass 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)	# 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. |	
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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	Comments noted. Conditions included

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.

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

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**

Crossrail 2	Transport for London 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 Okeiyi, **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 **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
Safeguarding Manager Crossrail 2
Investment Planning : Professional Services
Transport for London

Historic England	Historic England 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* *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

Greater London Archaeological Advisory Service	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: https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice 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. 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.	

NHS – London Healthy Urban Development Unit	Valerie Okeiyi Development Management London Borough of Haringey By email only: **London Healthy Urban Development Unit** **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

	Mhairi Summers Planning Officer NHS London Healthy Urban Development Unit.	
NEIGHBOURING PROPERTIES		

APPENDIX 4 Greater London Authority Stage 1 Response

GREATER**LONDON**AUTHORITY

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.[1]

[1] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-planhttps://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507guidance?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[2]. 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[3]. 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

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-planhttps://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidanceguidance/whole-life-cycle-carbon-assessments-guidance

[3] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-planhttps://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidanceguidance/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 preferrable, 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 SI5 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.

For further information, contact GLA Planning Unit (Development Management Team):
Tefera Tibebe, Strategic Planner (case officer)
email: tefera.tibebe@london.gov.uk

APPENDIX 5 QRP REPORT

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FRAME PROJECTS

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

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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.

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.

- 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.

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.

- 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.

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.

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 Maccreanor 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.

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 2nd 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.