



Jonathan Greenberg
JG Town Planning
Wohl Enterprise Hub,
Redbourne Avenue,
London, N3 2BS

Jonathan@jgtplanning.com
07772707431

Date: 20 April 2026
Our Ref: JG/2423S73

London Borough of Haringey
Planning Service
5th Floor, Alexandra House,
10 Station Road, Wood Green,
London, N22 7TY

Dear Sir/Madam,

22 Palace Road, Wood Green, London, N11 2PS
Minor Material Amendment (S73) Application Pursuant to Planning Permission
HGY/2025/0363

On behalf of our client, TA Palace Road Limited, please find enclosed a Section 73 application to vary Condition 2, 7 and 13 attached to planning permission HGY/2025/0363, granted on 19th December 2025 which obtained consent for;

Redevelopment of the site, including partial demolition and conversion, to provide a three-storey rear extension and addition of a second storey to the existing building, to create five self contained flats.

Below I provide an overview of the required amendments, and commentary around the minor material amendment route.

Required Amendments

Following a detailed review of the approved plans and supporting documents it has come to the applicant's attention that various minor changes are required to ensure the development is feasible and can be implemented as quickly as possible. The amendments required relate to design detail regarding external appearance (condition 2), the proposed energy strategy (condition 7) and the Considerate Constructors Scheme (condition 13).

Condition 2 - Drawings and Documents

Condition 2 sets out the approved drawings and documents, this S73 application seeks to amend the following documents;

Drawings

Page 1 of 8 Rev.1 (Proposed Site Plan);

- Ground-floor amendments reflected as per points below.
- Visitor and rear cycle storage repositioned for improved access.

Page 5 of 8 Rev.2 (Proposed Ground Floor and Proposed First Floor Plan);

- Front entrance door style revised due to common stair redesign and accessibility requirements.
- Common stair updated to comply with Part K.
- Internal layouts slightly adjusted to retain as much of existing walls.
- New rear wall extended by 340mm to comply with minimum apartment area requirements.
- Rear patio/balcony doors changed to swing doors.
- Rear balcony posts added.
- 300 mm nibs introduced to leading edges.
- External front window openings to the common stair retained.

- Internal layouts updated to comply with Part B requirements (lobby and protected hallways).

Page 6 of 8 Rev.2 (Proposed Second Floor and Proposed Roof Plan);

- Amendments as per ground and first floor
- Front balcony doors revised to swing doors.

Page 7 of 8 Rev.4 (Proposed Front/Rear Elevations);

Front elevation –

- External render finish with feature header detail. The proposed external finish would comprise Webber Saint-Gobain render in “Winter White” or similar, which is a high-quality proprietary render system that provides a durable and consistent finish. The colour and appearance would closely match the existing rendered finish of the neighbouring property, ensuring a cohesive appearance within the terrace. Render is also more feasible than brick in this instance, allowing the development to integrate with the surrounding built form while delivering a clean and high-quality external finish.
- Entrance door layout updated (as noted above).
- First-floor common stair windows retained (as above).
- Second-floor doors revised to swing doors.

Rear Elevation –

- As per front elevation
- Rear doors revised to swing doors.
- First-floor balcony redesigned as a free-standing structure to improve buildability and remove the need for a lowered structure, downstand, and reduced ceiling height to ground-floor flats.

Page 8 of 8 Rev.4 (Proposed Side Elevations);

- As per front and rear elevation

PR124758-11A (Landscape Proposal);

- Amended as per proposed site plan.

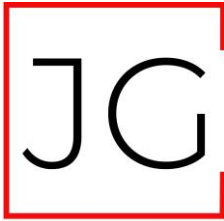
Documents

Energy & Sustainability Assessment – issue with TM54 dated 06/05/2025;

- To be replaced with Energy & Sustainability Statement dated 21/08/2025
(please see below for more details)

To clarify, the following drawings/documents are proposed to be amended;

Approved Drawing/document	Proposed Revised Drawing
Page 1 of 8 Rev.1 (Proposed Site Plan)	Site Plan - As Proposed
Page 5 of 8 Rev.2 (Proposed Ground Floor and Proposed First Floor Plan)	Proposed Ground & First Floor Plans
Page 6 of 8 Rev.2 (Proposed Second Floor and Proposed Roof Plan)	Proposed Second Floor & Roof Plans
Page 7 of 8 Rev.4 (Proposed Front/Rear Elevations) Page 8 of 8 Rev.4 (Proposed Side Elevations)	Proposed Elevations - Sheet 1 Proposed Elevations - Sheet 2
PR124758-11A (Landscape Proposal)	PR124758-11A
Energy & Sustainability Assessment – issue with TM54 dated 06/05/2025; L01_flat 3 (partial refurb)-Be Lean-02/05/2025;	Energy & Sustainability Statement (21/08/25)



TOWN PLANNING

L02_flat 5 (now build)- Be Lean-02/05/2025; L01_flat 3 (partial refurb)- Be Green-02/05/2025; L02_flat 5 (now build)- Be Green-02/05/2025;	
--	--

Condition 7 - Energy Strategy

Condition 7 (and condition 2) requires the development to be constructed in accordance with the Energy and Sustainability Assessment dated 6 May 2025.

Following detailed design and cost review by the applicant, in light of current financial market conditions, it has become clear that the energy strategy approved as part of the original permission is not deliverable and therefore requires amendment.

The approved strategy was based on electric heating, including electric storage heaters for space heating, individual heat pumps for domestic hot water, mechanical ventilation with heat recovery (MVHR) and photovoltaic panels. In order for this approach to meet the required carbon reductions, the building fabric specification was designed to achieve very low space-heating demand comparable to Passivhaus levels.

Following further review of the above, these performance standards are extremely difficult to deliver within the refurbishment elements of the scheme, which involve the conversion and extension of the existing building. Achieving the required insulation levels, airtightness and thermal performance would require significant alterations to the existing structure and build-ups, which would affect the feasibility of the development.

In light of the above, an updated Energy and Sustainability Assessment has therefore been prepared and submitted with this S73 application. The revised strategy adopts a

more deliverable servicing approach comprising a heat pump serving the new-build unit, gas combi boilers serving the refurbished flats, and an increased photovoltaic array of 6.8 kWp.

The revised strategy delivers on-site carbon reductions through a combination of improved building fabric and renewable energy generation, while ensuring that the scheme can be implemented in a viable manner. The updated strategy continues to achieve significant on-site carbon reductions and remains consistent with the London Plan energy hierarchy.

The proposed amendment therefore seeks approval for the updated Energy and Sustainability Assessment dated 21 August 2025 in place of the previously approved document referenced in Condition 2 and 7.

Condition 13 - Considerate Constructor's Scheme

Condition 13 states the following –

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

Given the small scale of the development (five residential units) and limited construction activity, we consider mandatory registration with the Considerate Constructors Scheme to be disproportionate. The construction impacts of the development will instead be managed through the Construction Logistics Plan and Dust Management Plan submitted to and approved by the Local Planning Authority in accordance with relevant conditions.

The reason for the condition refers to compliance with London Plan Policy 7.14 however we note that there is no Policy 7.14 within the adopted London Plan and that this policy is only found in the previous London Plan (2016) and relates to 'Improving Air Quality'. Further to this, registration with the Considerate Constructors Scheme is not a requirement of the London Plan.

In this context, the requirement to register with a voluntary third-party scheme is considered unnecessary, unreasonable and therefore contrary to Planning Practice Guidance (Paragraph: 003 Reference ID: 21a-003-20190723). We respectfully request that this condition be removed or amended to instead require adherence to best practice construction management measures secured through the approved plans.

Minor Material Amendment Applications

The NPPG states there is no statutory limit on the degree of change permissible to conditions under s73, but the change must only relate to conditions and not to the operative part of the permission. Planning permission cannot be granted under section 73 to extend the time limit within which a development must be started or an application for approval of reserved matters must be made. Section 73 cannot be used to change the description of the development.

The proposed amendments are minor in nature and would not materially alter the scale, massing or overall form of the approved development. The changes relate primarily to minor internal layout adjustments, a small extension to the rear wall of approximately 340 mm to ensure the units meet internal space standards, and a change in external finish from brick to render. These amendments do not alter the number of units and would not give rise to any additional planning impacts when compared with the approved scheme.

The amendments would not materially affect neighbouring amenity, including daylight, sunlight, outlook or privacy, when compared with the approved scheme.

This proposal does not seek to justify the changes as non-material, but rather as minor amendments which are acceptable in planning terms and do not differ substantially from the consented scheme. The amendments relate only to Conditions 2, 7 and 13 and do not alter the description of development under the extant consent. The proposed changes are therefore not considered to render the approved scheme unacceptable in terms of its layout or energy strategy.

Conclusion

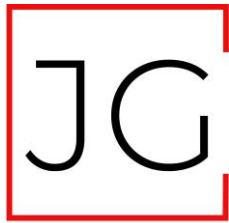
It is considered that the proposed amendments are both acceptable and necessary to enable the development to be built. As discussed within this letter current market conditions have caused feasibility issues in relation to approved materials and the energy strategy. The amendments are minor in nature and would not give rise to any material planning impacts when compared with the approved scheme.

We believe that the enclosed information provides a sufficient basis to justify the variation of the relevant conditions. However, should any further details be required, please do not hesitate to contact me in the first instance.

We trust that the above submission and accompanying documents clearly demonstrate that the proposed change constitutes a Minor Material Amendment to the extant consent.

This application comprises:

- Existing approved drawings (listed above)
- Proposed amended drawings (listed above)
- Energy & Sustainability Statement
- Fee for £699 (paid separately)



TOWN PLANNING

I look forward to receiving confirmation of registration in due course.

Yours faithfully,

Jonathan Greenberg
Founder, JG Town Planning
MTCP, MRTPI