

2026

re:shape

Planning Statement

Ashley Park



Ashley Park Planning Statement (Including Affordable Housing Statement and Tall Building Assessment)

Re:shape T Ltd

August 2026

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Lichfields, on behalf of Re:shape T Ltd (the “Applicant”, “Re:shape”) in relation to the mixed-use development at the former Ashley House site, Ashley Road, Tottenham Hale, London, N17 9LZ (the “Site”). The Local Planning Authority is the London Borough of Haringey. The scheme for the former Ashley House site is known for the purposes of this application as ‘Ashley Park’.
- 1.2 The planning application proposes the development of a high-quality scheme comprising shared living accommodation (*Sui Generis*) and residential accommodation (Use Class C3), alongside community and commercial floorspace and new landscaping and public realm to facilitate a green east-west link between Down Lane Park and the wider Tottenham Hale District Centre.
- 1.3 The C3 residential accommodation is entirely social rented housing and includes a large proportion of family sized units. The scheme represents a significant opportunity to deliver high-quality accommodation to support a mixed and balanced community and contribute to the realisation of the Ashley Road South Masterplan.
- 1.4 The application seeks full planning permission for the following description of development (the ‘Proposed Development’):

“Full planning permission for a phased mixed-use development comprising: (i) enabling works and operations; (ii) residential development (Use Class C3) including affordable housing; (iii) shared living accommodation (Sui Generis), (iv) commercial and community floorspace (Use Classes E and F2); and (v) site-wide and/or phase-specific access, servicing, public realm, blue-badge parking, cycle parking, open space, hard and soft landscaping, utilities, plant and all other associated works”.

Re:shape – The Applicant

- 1.5 Re:shape will develop and operate the shared living part of the Proposed Development, meaning they have a long-term vested interest in the quality and success of the scheme.
- 1.6 Founded in 2020, Re:shape is a forward-thinking partnership that acquires, develops, and operates Alternative Living buildings across the UK. Re:shape has an established track record in shared living development, supported by a strong pipeline of emerging developments in London, including in Woolwich, Wimbledon, Bethnal Green and Homerton. See www.reshapeliving.co.uk for further information.
- 1.7 Re:shape is known for creating the 1,000-bed operational ARK Co-living platform, with schemes operating in locations including Wembley and Canary Wharf, and more recently Shoreditch. See www.arkcoliving.com for more information.
- 1.8 This operational know-how and experience underpins Re:shape’s reputation as a long-term custodian of places, focused on stable ownership, high-quality management, and enduring community value. Re:shape’s purpose is to address challenges around affordability and displacement within cities, delivering living environments that foster community, sustainability, and wellbeing. This is achieved by optimising the development potential of

underutilised land to create places that respond to the needs of an ambitious new generation across the UK.

- 1.9 Re:shape's schemes are characterised by high-quality design, strong environmental performance, and professionally managed operational models that prioritise resident wellbeing and long-term sustainability.
- 1.10 Re:shape's also champion community led, placemaking by firstly, a commitment to deliver mixed and balanced communities, with shared living and social rent homes side by side where possible, and secondly, its Community Investment Programme (CIP), which embeds, localised social value into every project.
- 1.11 The CIP includes investment in local initiatives, partnerships with charities, entrepreneurs, and SMEs, and programmes focused on skills, employment, and social mobility to ensure that local communities directly benefit from its planning proposals. Re:shape views development not as a short-term transaction, but as a platform for long-lasting positive impact within local communities. In Haringey, in advance of this application submission, Re:shape and its team have reached out to 10 charities and organisations to discuss how their work could be assisted by the Proposed Development, the team has attended and assisted at charity events locally and will provide a community floorspace within the proposed scheme, for use by local organisations.
- 1.12 Further information on the CIP and its anticipated benefits for Tottenham Hale are set out in the submitted Community Investment Programme (CIP) Social Impact Report and Impact Charter.

Scope of Application

- 1.13 This Planning Statement should be read in conjunction with the following application forms, drawings and supporting documents:
- 1 Planning Application Form (including Ownership Certificate)
 - 2 CIL Additional Information Form 1
 - 3 Site Location Plan
 - 4 Existing site plans, showing site levels
 - 5 Full set of proposed plans and drawings, including sections and elevations, as listed in the drawings schedule at Appendix 1, prepared by DLA
 - 6 Landscape drawings, prepared by Studio Bosk
 - a AHCF-BOSK-ZZ-00-DR-L-1000 Ashley Park Landscape Plan Rev P16 1:200@A1
 - b AHCF-BOSK-ZZ-RF-DR-L-1000 Ashley Park Roof Landscape Plan Rev P10 1:200@A1
 - 7 Design and Access Statement
 - 8 Planning Statement, including Affordable Housing Statement, Tall Building Assessment and draft S106 Heads of Terms
 - 9 Environmental Impact Assessment, covering the following topics that have been Scoped in to the ES, and all relevant Appendices at ES Volume 3:

- a Socio-Economics (ES Volume 1);
 - b Noise and Vibration (ES Volume 1);
 - c Wind Microclimate (ES Volume 1);
 - d Daylight, Sunlight, Overshadowing and Solar Glare (ES Volume 1);
 - e Townscape and Visual Impact Assessment (TVIA) (ES Volume 2).
- 10 Landscape Strategy, including Urban Greening Factor
 - 11 Internal Daylight and Sunlight Report
 - 12 Air Quality Assessment, including Air Quality Neutral Assessment
 - 13 Noise and Vibration Assessment
 - 14 Health Impact Assessment
 - 15 Equalities Impact Assessment
 - 16 Sustainability Statement, including BREEAM Pre-assessment
 - 17 Whole Life Carbon Assessment (and GLA memo)
 - 18 Circular Economy Statement (and GLA memo)
 - 19 Energy Assessment Report, including Overheating Assessment (and GLA memo)
 - 20 Utilities Strategy
 - 21 Phase 1 Geotechnical and Geoenvironmental Desk Study
 - 22 Flood Risk Assessment and Sustainable Urban Drainage Strategy, including Haringey Drainage Proforma
 - 23 Transport Assessment, including Active Travel Zone Assessment
 - 24 Framework Travel Plan
 - 25 Delivery and Servicing Plan
 - 26 Operational Waste Management Plan
 - 27 Outline Site Waste Management Plan
 - 28 Outline Construction Logistics Plan
 - 29 Outline Construction Environmental Management Plan, including dust and emissions
 - 30 Ecological Appraisal, including BNG Statement
 - 31 BNG Metric spreadsheet
 - 32 Arboricultural Survey and Impact Assessment, including Tree Constraints Plans
 - 33 Shadow Habitats Regulation Assessment
 - 34 Heritage Impact Assessment
 - 35 Archaeological Desk Based Assessment
 - 36 Outline Fire Statement (London Plan Fire Statement)
 - 37 Fire Statement (Gateway One Form)

- 38 Security Needs Assessment and Crime Impact Statement
- 39 Shared living Operational Management Plan
- 40 Shared living Needs Assessment
- 41 Commercial Strategy
- 42 Economic Statement
- 43 Statement of Community Involvement
- 44 Community Investment Programme (CIP) and Impact Charter
- 45 Social Impact Report
- 46 Aviation Impact Assessment

- 1.14 The application relates to the Ashley House site only, located west of Ashley Road and east of Down Lane Park, as shown in the figure below.
- 1.15 A scoping opinion was requested prior to submission of the application. The EIA has been prepared having regard to the scoping request and the applicant's assessment of topics to be scoped in and out.

Figure 1 – Site Location Plan prepared by DLA Architecture.



Phased Approach

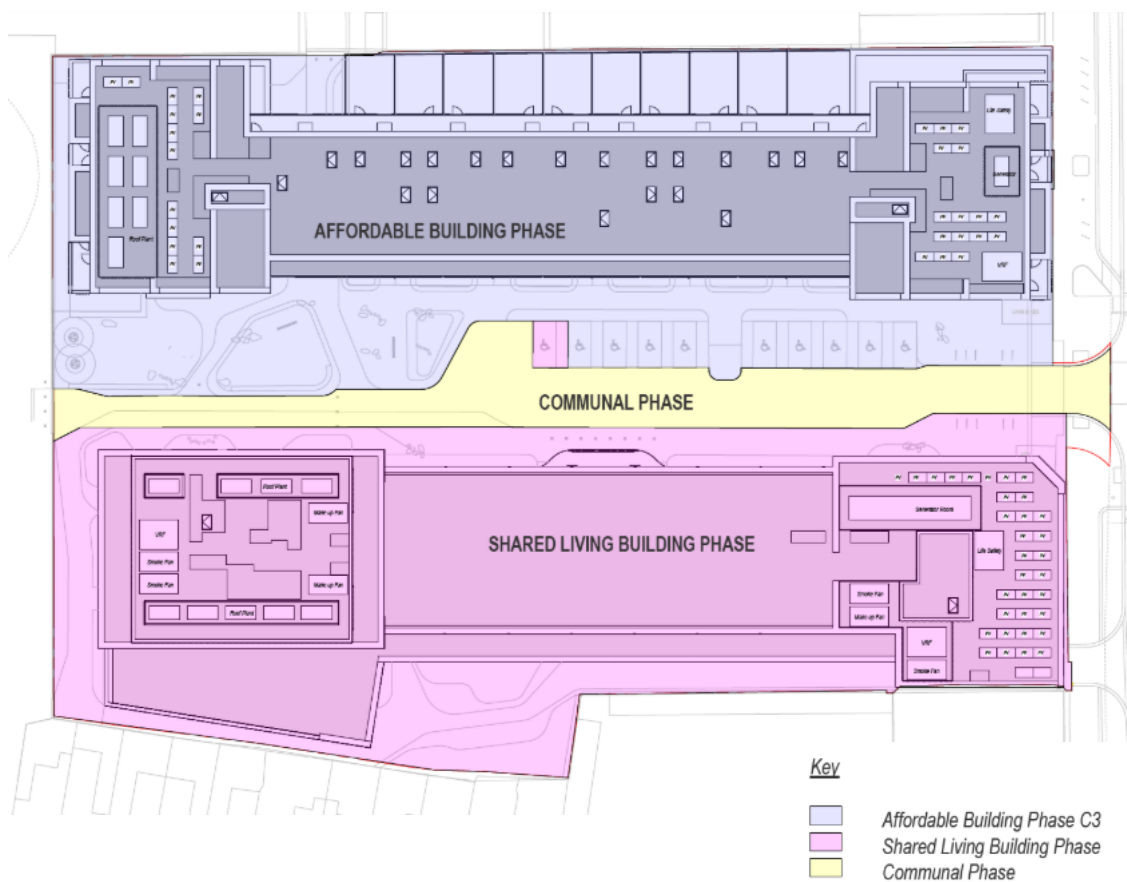
- 1.16 Permission is sought for a phased mixed-use development. The Proposed Development will be brought forward in 'phases' and it is envisaged that the conditions and obligations, to be

agreed in due course, will be associated with the relevant phase of development, and discharged accordingly.

1.17 At this time, the phases are indicative only, as shown in the figure below. We anticipate that a phasing condition will be attached to the permission, requiring details of phasing to be discharged in due course. The phases identify the different parts of the development, but are not intended to represent specific sequencing. It is anticipated the phases will comprise:

- i Enabling works and operations;
- ii Residential development (Use Class C3), comprising an affordable housing block, commercial floorspace (Use Class E) within the block, and the immediately adjacent public realm that enables access to the building. This phase includes the play space and blue badge car parking spaces which relate to the affordable homes;
- iii Shared living accommodation (Sui Generis), comprising a shared living block, the community and commercial floorspace within the block (Use Classes E and F2) and the immediately adjacent public realm that enables access to the building. The phase also includes the ground floor communal amenity spaces accessible only to shared living residents, and the blue badge parking space associated with the shared living block;
- iv Site-wide (and/or phase-specific) access, servicing, public realm, cycle-parking, open space, hard and soft landscaping, utilities, plant and all other associated works.

Figure 2 – Indicative Phasing Plan prepared by DLA Architecture



- 1.18 Construction and operation of the residential and shared living buildings will likely come forward simultaneously. The Application is phased only to help clearly delineate the spaces within the scheme that are managed by the shared living operator and the future Registered Provider. This will also enable conditions and obligations to be tied to each specific space or building, or, where required, ensure that any shared space is delivered before either plot can come forward.

Planning Benefits

- 1.19 A detailed assessment of the Proposed Development is provided at Sections 7.0 – 16.0. A summary of the development's substantive planning benefits is as follows:
- 1 The delivery of an exemplary high-quality design, with high quality and contextually appropriate architecture and proposed materials, with sustainability considered throughout the design.
 - 2 Residential development that will make a significant contribution to meeting housing need and support a diverse and multi-generational community.
 - 3 The delivery of affordable C3 housing all of which comprises Social Rent homes, including family sized, accessible units. These units will benefit from wheelchair accessible car parking, and private amenity spaces including rear gardens.

- 4 Provision of high-quality shared living accommodation which meets a defined local need and responds positively to the Site's location and character.
- 5 Optimisation of an accessible brownfield site in a highly sustainable location and completion of a remaining plot within the Ashley Road South Masterplan.
- 6 A new east-west link, facilitating connection between Down Lane Park into the Tottenham Hale District Centre that will in due course enhances permeability and connectivity to the wider area and existing community, helping to deliver one of the Council's long-held visions for the area.
- 7 High-quality landscaping and urban greening to create attractive and functional public realm and amenity space, including the delivery of 76 new trees.
- 8 Provision of commercial floorspace at ground floor level to create active frontages along Ashley Road. This space will create active frontages, and contribute to the activity, vibrancy and security of the public realm, offer employment opportunities, and bring local amenities closer to the Site for residents.
- 9 Provision of new flexible community floorspace targeted towards local groups or charities, to support and meet the needs of the existing and future community and provide a space for local groups and charities to hold a variety of events.
- 10 Anticipated creation of 180 new jobs through the construction phase and 21 new jobs during operation.
- 11 Place-making benefits including enhancement of the area's townscape, improved visual amenity, permeability across the Site and improved legibility and wayfinding.
- 12 High quality and contextually appropriate architecture and proposed materials, with sustainability considered throughout the design.
- 13 Delivery of sustainable transport objectives through encouraging cycle and walking, providing safe and secure cycle parking, and a variety of options for cycle hire bikes.
- 14 The delivery of highly sustainable buildings, achieving BREEAM Excellent commercial spaces, incorporating green energy generation through PV panels, and reducing waste through circular economy principles embedded into the design and management of the scheme.

Structure of Planning Statement

1.20 The remainder of this Planning Statement is structured as follows:

- Section 2.0 – Site and Surroundings
- Section 3.0 – Relevant Planning History
- Section 4.0 – Proposed Development
- Section 5.0 – Pre-Application Engagement and Consultation
- Section 6.0 – Planning Policy Context
- Section 7.0 – 16.0 Planning Assessment
- Section 17.0 – Section 106 Heads of Terms

- Section 18.0 – Summary and Benefits

2.0 Site and Surroundings

Application Site

- 2.1 The Site is approximately 0.7ha and is broadly rectangular in shape. The Site comprises vacant brownfield land, with the previous industrial buildings having been demolished in August 2023. It is currently largely cleared hardstanding with some limited scrub vegetation, surrounded by hoardings.
- 2.2 The Site is located to the west of Ashley Road and east of Down Lane Park, south of the Rosa Luxemburg residential building and north of a terrace of residential properties along Hale Road. Berol House, a locally listed building, sits on the opposite side of Ashley Road. There are no listed buildings or Conservation Areas adjoining the Site.
- 2.3 The Site sits within the following policy designations, evidencing its strategic and sustainable location:
- The Upper Lee Valley Opportunity Area;
 - The Tottenham Hale Area Action Plan area; and
 - The Tottenham Hale District Centre (lower half of the site).
- 2.4 The Site has a PTAL of 5, with a very minor part of the Site achieving 6a towards the western end, indicating very good/excellent public transport accessibility. It is located approximately 200m northwest of Tottenham Hale underground and railway station.

Surrounding Area

- 2.5 The surrounding area has undergone significant change in recent years.
- 2.6 The GLA allocated 31 Housing Zones across London in a bid to provide 150,000 associated jobs and 75,000 new homes over the next 10 years. Tottenham has been identified as one of the Housing Zones, and it will provide 1,965 homes, of which 560 homes will be affordable.
- 2.7 Tottenham Hale also falls within the GLA's Lee Valley Opportunity Area. This area will provide a minimum of 15,000 jobs and 20,100 new homes. The London Plan identifies a number of key growth points throughout the Upper Lee Valley including Tottenham Hale which is considered suitable for higher density development.
- 2.8 At the local level, the Tottenham AAP identifies Tottenham Hale as a key growth area where 5,000 jobs and 10,000 new homes will be delivered. The area has also been identified as a new District Centre and the Council promotes a mix of town centre and residential uses in this immediate area.
- 2.9 Given these wider regeneration objectives for Tottenham, the area surrounding the Site is experiencing transformational regeneration and a significant uplift in scale as promoted throughout the policy framework.
- 2.10 The Site sits within the Ashley Road South Masterplan (ARSM). The immediate area is characterised by a mix of uses and building heights including a range of recent developments within the ARSM area. The majority of these developments have been built

out or are under construction and provide ground and lower floor commercial units with residential units on the upper floors, including the following schemes/buildings:

- **Berol Quarter** – immediately to the east of the Site, planning permission (S73 ref. HGY/2025/0930) has been granted for the refurbishment and vertical extension of Berol House for commercial/cultural uses and arts floorspace and a c.32 storey Build to Rent building at 2 Berol Yard.
- **The Gessner** – located to the north of the Berol Quarter, a completed scheme up to 14 storeys in height providing commercial floorspace and residential units on the upper floors. This scheme has been delivered and is operational. It was originally approved as part of the original Berol Yard planning permission (ref. HGY/2017/2044).
- **The Sessile** – located to the west of The Gessner building, a residential scheme with ground floor commercial units, up to 13 storeys. This scheme has been delivered and is operational.
- **Rosa Luxemburg building** – immediately north of the Site, 10-storey residential building providing affordable housing. This scheme has been delivered and is operational.

Figure 3 – Aerial view of the site prepared by DLA Architecture.



- 2.11 The ARSM was originally developed jointly by Notting Hill Genesis (NHG) and Berkeley Square Developments as a plan to deliver cohesive development and covers 2.67ha of previously industrial land occupied by one/two storey warehouses and their associated yards. The vision for the ARSM has since been brought forward through planning applications including those listed above. The Ashley House site presents an opportunity to deliver development on one of the remaining masterplan sites.
- 2.12 An application for the former Cannon Factory site, to the northeast of the Site, bounded by Watermead Way, Burdock Road and Ashley Road, is also undergoing pre-application

engagement and will be submitted in due course. The former Ashley House site and Cannon Factory site form the final undeveloped pieces of the ARSM (alongside the site of 2 Berol Yard).

- 2.13 To the south of the Site and ARSM, there are a number of sites being delivered as part of the 'Heart of the Hale' development, with permission for six buildings up to 38 storeys in height (ref. HGY/2018/2223) including North Island, Ferry Island and the Welbourne building. Some of the buildings have been delivered and are operational, others are imminently to be completed. Also, to the south, there are a number of buildings on the south side of Hale Road comprising Millstream Tower (residential), The Hale (student accommodation) and a Premier Inn. Further to the south of Ferry Lane is the Tottenham Hale retail park.
- 2.14 The area to the east on the adjacent side of Watermead Way/ the station has also undergone significant and recent change, with a number of high density residential-led developments around Hale Wharf and Perklyn Square. Further to the east is The Paddock Community Nature Park and the Walthamstow Wetlands nature reserve.
- 2.15 Down Lane Park runs to the west of the Ashley House site and includes tennis courts, a football pitch and some mature trees close to the site. The northern part of the park beyond The Sessile is identified as a local Site of Importance for Nature Conservation (SINC). The area to the west of the site between Down Lane Park and Tottenham High Road is characterised by low rise residential development. An improved scheme of landscaping and social infrastructure in the park has been approved, and an amended version has been consulted on.
- 2.16 The Harris Academy secondary school is also in the vicinity of the Site, located on the east side of Ashley Road, north of Burdock Road.

3.0 Relevant Planning History

Extant Consents

- 3.1 There are extant, implemented consents on the Site, following previous planning applications by the former owner, Notting Hill Genesis (NHG).
- 3.2 The wider former Ashley House and the former Cannon Factory site (located at the northern end of Ashley Road, on the corner of Burdock Road and Watermead Way) was originally granted outline planning permission in May 2018 (ref. HGY/2016/4165 approved 02/05/2018) for:
- “Demolition of the existing buildings at Ashley House and Cannon Factory and erection of three buildings to provide up to 3,600sqm of commercial floorspace (GEA) (Class A1/A3/B1/D1), up to 265 residential units (Class C3), new public realm, landscaped amenity space, car and cycle parking and all associated works.”*
- 3.3 Reserved Matters Application (RMA) (ref. HGY/2018/2353) for appearance, landscaping, layout, scale and access details was approved in November 2018.
- 3.4 The outline permission and RMA was subsequently amended by Non-Material Amendment (NMA) application ref. HGY/2018/2210 to update the approved parameter plans.
- 3.5 The RMA was subsequently amended via further NMAs to update the wording of conditions to allow for site demolition, clearance and drainage works to be carried out prior to submission of details (refs. HGY/2022/4230 and HGY/2023/0890). This was implemented by way of demolition works and confirmed via a certificate of lawfulness (ref. HGY/2023/1622) in August 2023. This permission remains extant.
- 3.6 In relation to the southern part of the Ashley House site only, full planning permission ref. HGY/2019/0108 (refused by the LPA) was approved at appeal on 16/04/2020 (ref. APP/Y5420/W/19/3232707) for:
- 3.7 *“Demolition of existing buildings and erection of a part 6, part 8 storey building to provide 97 residential units (Class C3), 170 sqm of commercial floorspace (Class A1/A3/B1), new public realm, car and cycle parking and associated works.”*
- 3.8 NMA ref. HGY/2022/4229 approved 03/03/2023 then made changes to the wording of conditions to allow for site demolition, clearance and drainage works to be carried out prior to the submission of details.
- 3.9 The implementation of both planning permissions has been confirmed by the approval of Certificate of Lawfulness (existing use) applications as follows, and both permissions remain extant:
- 1 Ashley House and Cannon Factory - ref. HGY/2023/1622 approved 21/08/2023:
“Certificate of lawfulness (existing use) for implementation of planning permission HGY/2016/4165, by way of demolition works involving the demolition of brickwork, demolition of corrugated walls, dismantling of roller shutters, and removal of windows.”
 - 2 Ashley House site only - ref. HGY/2023/1621 approved 21/08/2023:

“Certificate of lawfulness (existing use) for implementation of planning permission HGY/2019/0108 allowed at appeal under APP/Y5420/W/19/3232707, by way of demolition works involving the demolition of brickwork, demolition of areas of the facade and removal of windows.”

- 3.10 There has been no further development activity at the Site following site clearance in 2023. The developments stalled and were no longer considered deliverable, leading to the previous owner’s sale of the site to Re:shape to bring forward new proposals.
- 3.11 It would not be viable to deliver the extant consents in the current market, for a number of reasons. Firstly, the buildings were not ‘Gateway’ compliant or up to current building standards. The design interventions required to bring these up to the necessary standards for operation today would be significant and would render the developments unviable, given the space requirements for new stair cores and lifts and the separating of cores required throughout the buildings. Revisiting the designs would necessitate material amendments to the planning applications, and the conditions and obligations previously approved would need to be reopened and the changes may require a new planning application. Energy and sustainability requirements have changed and would need to be retrofitted into the previous schemes, which would be complex, require more space and add additional costs. Updated policy on cycle stores and housing guidance has been adopted which it would be preferable to incorporate to optimise the available floorspace.
- 3.12 The context of the locality has also changed significantly. The Ashley House/Cannon Factory consent was one of the earliest permissions to be gained within the ARSM. Later permissions increased the height, scale and quantum of development in the area and have been transformational to Tottenham Hale. Many of these are now complete or under construction, such as Ferry Island, Millstream Tower, Welbourne Building, Ashley Depot, and The Hale. The height, scale and massing of the extant consents should be revisited in this new context, to optimise the Site’s capacity, in accordance with London Plan policy, via a design led approach that responds to its new townscape, streetscape and local context more appropriately.
- 3.13 It was concluded by the previous owner of the Site that the delivery of the schemes would not be feasible in the current market, hence the sale. Meanwhile, Re:shape has successfully developed a number of similar, well-located sites, for a mix of uses and living types that offer a modern solution to housing pressures. The Site is considered suitable for a mixed-use development including shared living and offers an excellent opportunity to deliver enhanced proposals by Re:shape. A revisited scheme would be to current standards and requirements, respond to the current market and economic context and the updated townscape context, and can contribute to the completion of the ARSM, regeneration of the Tottenham Hale District Centre, objectives of the Shaping Tottenham Strategy and respond to acute local and strategic housing need.

4.0 Proposed Development

4.1 This section provides a summary of the Proposed Development. Further details of the proposals are set out in the accompanying Design and Access Statement, prepared by DLA Architecture.

Site Layout

4.2 The site layout comprises two new linear buildings running east west:

- a 6-storey affordable housing building to the north of the site (the northern block); and
- a part 6-, part 23-storey shared living building to the south of the site (the southern block).

Figure 4 – Site layout plan prepared by DLA architecture



4.3 The taller element of the southern block is located to the west of the block, neighbouring Down Lane Park, whilst the 6-storey element reflects the shoulder height of the adjacent building at Ashley Road West.

4.4 An under-croft route through the affordable housing block, towards the western end, is allowed for, which aligns with the existing route to the north of the Site.

4.5 The building arrangement creates a landscaped central route through the middle of the Site known as the 'Ashley Link'. This provides play space, accessible car parking and accommodates servicing as well as acting as a key pedestrian and cycle route linking the site

and the park to Ashley Road and into Berol Yard, enhancing permeability and connectivity between the District Centre, Tottenham Hale station and the wider area.

- 4.6 The internal layouts of the buildings have been designed in accordance with current requirements relating to fire, waste and servicing, accessibility and other requirements.

Shared living use

Shared living units

- 4.7 The Proposed Development includes a shared living building (Sui Generis use) of 522 studios, including 53 accessible DDA studios (10%, of which 7% are adaptable and 3% are accessible on day one), located in the southern block.
- 4.8 Shared living is also known as Purpose Built Shared Living (PBSL) and is described in the London Plan as non-self-contained market housing with shared communal amenities. Shared amenities encourage social interaction amongst residents, and these are provided through well-designed and located shared living spaces including large kitchens, living rooms, cinema rooms, gyms, co-working spaces and private dining rooms.
- 4.9 Each resident's private space consists of a bedroom with an en-suite bathroom, a kitchenette and integrated storage space. All units are between 20sqm and 32sqm. Details of the proposed studio layouts/design are included in the Design and Access Statement.
- 4.10 Shared living typically provides accommodation for single-person households who do not want to live with their parents, and/or want to live in good quality, well-designed buildings with other people in a way which is not necessarily provided for in self-contained homes or House of Multiple Occupation ('HMO').
- 4.11 The Large-Scale Purpose-Built Shared living London Plan Guidance document (LPG, February 2024) defines shared living in planning terms. It emphasises that shared living differs from self-contained housing (use class C3), house in multiple-occupation (use class C4/sui generis), hotels (use class C1), hostels (sui generis) and residential institutions (use class C2). Policy H16 of the London Plan sets out specific criteria that shared living developments must meet. As set out in section 8.0 of this Planning Statement, the Proposed Development accords with the criteria set out in Policy H16 and is a sui generis use class.

Shared living – communal amenity space

- 4.12 All residents will have access to the building's communal amenity spaces which are an important part of the residential shared living experience. These spaces include resident's lounge, master chef style kitchens and dining areas, co-working spaces, external terraces, gym and wellness facilities, and multi-media rooms. This amenity space offering is distributed across the building to reflect the function of the space provided and to maximise opportunities for human connection.
- 4.13 At ground level, a large entrance and amenity space is provided. At roof level within the tall building element of the shared living building, a residents' lounge is provided, ensuring that all residents have access to the best views the building offers. Communal outdoor spaces are provided at roof level, above the lower element of the building, and to the rear of the building at ground floor level. A total of 1,547sqm internal amenity spaces, and 1,045sqm

external amenity space is provided, equating to 5sqm combined internal and external amenity space per resident, which is in excess of policy requirements for 1,544sqm of internal and 461sqm of external amenity space.

Affordable Housing

- 4.14 The northern block provides 87 affordable homes, all of which are at Social Rent levels. The proposed housing mix is as follows and was determined following discussions with the local authority with regards to increasing family-sized units:
- 14 x 1B2P units (16%);
 - 51 x 2B4P units (59%);
 - 12 x 3B5P units (14%); and
 - 10 x 4B6P maisonettes (11%).
- 4.15 All units have private outdoor amenity space in the form of balconies, with larger ground floor maisonettes units for larger families in the borough having generous private gardens.
- 4.16 This quantum of affordable housing represents 36%, ie: over 35%, of the shared living provision by habitable room and by NIA.
- 4.17 When applying the equivalency principle, the proposed on-site affordable housing provision, comprising 100% Social Rent housing, equates to 52% affordable housing by both habitable room and NIA. This represents a significant overall contribution to affordable housing within LBH. The overall percentage has increased from the position presented at pre-application stage (49% by hab room and 48% by NIA), reflecting the incorporation of LBH's design comments and the finalisation of the unit mix. In particular, the revised scheme provides a greater proportion of affordable housing physically, increasing from 35% to 36% by habitable room and from 34% to 36% by NIA.
- 4.18 The ground floor of the affordable housing block includes two cores at the east and western ends of the building, with a row of two-storey maisonettes in between, each with their own front doors accessible from the new central route through the site. Flats are provided in the storeys above.

Non-residential Floorspace

Commercial floorspace

- 4.19 230sqm of commercial floorspace is provided within the Proposed Development, across the commercial units within the Proposed Development. One commercial unit (75.8sqm) is proposed within the northern affordable housing block and two smaller units (that could also be adjoined) are within the southern shared living block (totalling 154.4sqmsqm) – 230.21sqm in total. The commercial spaces are located on either side of the central route through the site, and adjacent to Ashley Road.
- 4.20 All units are proposed as flexible Class E use, anticipated to provide small retail or town centre uses, activating the corners of the site and marking the entrance. The commercial floorspace could also be let as affordable commercial/retail units, to attract local businesses

and SME, and also optimise the letting potential and long-term occupation, and reduce risk of vacancy.

Community floorspace

- 4.21 A community space is proposed at the ground floor on the western side of the shared living building, adjacent to the park. This space comprises 125sqm and is proposed as Use Class F2 floorspace. It has been designed to be able to be used flexibly, with external access from the street. There is also the possibility of internal access from the shared living building to maximise opportunities for integration between the local community and shared living residents, and to allow the shared living units to use the space on an ad hoc basis when not being used by local community groups and charities.

Landscaping

- 4.22 There is a proposed central route or green link, known as the ‘Ashley Link’, through the middle of the Site, as shown in the figure below. This provides a landscaped publicly accessible pedestrian and cycle route linking the Site and the park to Ashley Road into Berol Yard, the District Centre and wider area. This has long since been an aspiration of the Council for the area.

Figure 5 - Landscape strategy layout prepared by Studio Bosk



- 4.23 361sqm of ‘doorstep’ play space for 0–4-year-olds is provided within the Green Link, concentrated towards the west of the space closest to Down Lane Park. Accessible parking and a vehicle turning circle are provided in the central and eastern areas of the central route, screened from the play area by trees and planting. Trees and defensible planting are used to create a sense of separation and privacy between the accessible parking and affordable housing block. A 1.2m metal railing will also run in front of the ground floor affordable housing units.

- 4.24 As well as trees and planting, different paving types across the shared surface distinguish between the vehicular and pedestrian routes to help the space and different uses function effectively. Focal point trees and seating frame the eastern entrance to the Site from Ashley Road and the shared living building, creating a clear and legible route.
- 4.25 The western boundary treatment where the site meets Down Lane Park is characterised by low level ornamental shrub boundary to maintain a sense of visual openness, and a metal railing to tie in with railings beyond the Site.
- 4.26 To the south of the shared living block, a landscaped courtyard with seating and planting is provided as green amenity space for residents. In addition, there is a landscaped roof terrace/garden on the roof of the shared living block. Private rear gardens are provided for the affordable housing block, associated with the ground floor duplex units.
- 4.27 The affordable housing block provides 10 x 4-bed units on the ground floor, all with large private rear gardens.
- 4.28 Biodiverse green roofs are provided on both buildings. A total of 76 new trees will be planted, 56 at ground level and 20 at roof level, consisting of a wide variety of tree species.
- 4.29 Please refer to the Landscaping Strategy prepared by Studio Bosk for details, including the access and circulation strategy; planting scheme; materials palette and furniture/wayfinding details for the landscaping and public realm.

Access, Servicing and Parking

- 4.30 The Proposed Development is car-free except for blue badge holders and access for emergency, waste and refuse collection and servicing and delivery vehicles. Vehicular access to the site is from Ashley Road to the east. Space for a turning head and the blue badge parking is provided within the public realm, screened by trees and planting. Vehicles will be able to enter the Site, turn using the turning head and exit the site in a forward motion.
- 4.31 Servicing of the Site will be from the existing loading bays located along the western edge of Ashley Road. Please refer to the Delivery and Servicing Plan for details.
- 4.32 The blue badge parking provision is provided within the central public realm to the south of the affordable housing block. There will be 10 spaces in total, 9 associated with the affordable housing block (equating to 10.3% of the affordable units having access to a space) and 1 associated with the shared living block.
- 4.33 Pedestrian and cycle access to the Site is via the Green Link, as above. There is another route through the under croft of the affordable housing building in the northwest corner of the site providing a secondary link to Down Lane Park and towards the developments to the north of the site. The under-croft forms part of the public realm and will feature public art and a climbing wall.
- 4.34 A mix of long- and short-term cycle parking for residents and visitors is provided across the Site. A total of 116 long stay cycle parking spaces (comprising a mix of stand/parking space types) are proposed for the C3 residential units which are provided in three internal cycle stores within the ground floor of the block. A total of 252 long stay cycle spaces are proposed for shared living units which are provided in three internal cycle stores within the ground floor of the block.

4.35 There are 17 short term visitor cycle parking spaces provided within the public realm. The landscaping and site layout also allows for two hireable e-bike cycle parking areas (such as Lime bikes) that can both accommodate a maximum of 12 lime cycles, so 24 spaces overall.

4.36 Further detail is provided in the Transport Assessment and associated documents.

Energy Strategy

4.37 The energy strategy for the operational buildings provides all-electric energy for the development through separate communal systems implemented at each individual building. It is proposed to install central air source heat pumps on each block that are specifically designed to operate at the expected operating temperatures to maximise efficiency for that block

4.38 As required by London Plan Policy SI3, the energy strategy is designed to enable future connection to a District Heat Network, should this become available.

4.39 The energy strategy for the Proposed Development follows the London Plan's energy hierarchy approach of 'Be Lean', 'Be Clean', 'Be Green', and 'Be Seen' as detailed in policy SI2. The Energy Assessment provides details of the emissions at each stage, demonstrating that the Proposed Development achieves and exceeds relevant carbon reduction targets.

5.0 Pre-Application Engagement and Consultation

- 5.1 The Applicant and design team have undertaken extensive pre-application discussions with a wide range of stakeholders to inform the evolution of the Proposed Development. A summary is provided below.

Table 5.1 Pre-application Engagement and Consultation Summary

Engagement and Consultation	Summary
LBH pre-application meetings	A PPA was agreed with LBH and a series of pre-application meetings were held with planning, design, transport, regeneration, housing and other Officers from the Council, between December 2025 and August 2026. The regular meetings enabled an iterative design development process to take place, with Officers' feedback being incorporated into the proposals as they were developed and finalised. Key changes which were made in response to feedback received included: flipping the shared living and affordable blocks on the site, moving the location of the tallest element to where it would have the best placemaking and townscape role and least impact on residents, working through the approach to the green link including the incorporation of disabled car parking spaces and significant refinement to the landscaping approach, layout amends including the moving of entrances, inseting of first floor balconies and creation of maisonettes, movement of commercial space out of the affordable block and fronting the park, updates to the housing mix and provision of larger gardens for ground floor family sized units, updates to the amenity spaces across the shared living block including the creation of the rear courtyard amenity space, architectural and design changes to slim the tall building and ground the 'bookends' of the affordable block, work on the under-croft to ensure a fun and safe space and closing up of a second under-croft, consolidation of a small play space for 0-4 years, changes to the colour and materiality of the buildings to bring playfulness and celebratory elements to the scheme and respond to wider feedback on the use of red and green around the site, and other matters.
LBH Quality Review Panels	QRP sessions were held in April 2026 and June 2026. The Panel supported the development of the scheme and considered the heights and massing to sit comfortably within townscape views, and the simple palette and expression of base middle and crown of the tall building element was commended. Internal layouts, amenity provision and active frontages were noted to be well-considered. The linear movement and access through the site to the park was considered positive; with suggestions made to improve the locations of entrances on the affordable block and ensure 'celebratory' moments. This would improve the arrival experience for residents, amend the feel of the central public space to be more civic rather than courtyard-like as well as allow for the incorporation of a quantum of play within the area.

Engagement and Consultation	Summary
	Comments were made, and taken on board, in relation to the design of the affordable block, including better grounding the 'bookend' elements of the building, making the deck access more distinctive, and adding playful artwork to the undercroft. These were presented in a final panel session on 19th August, and it was confirmed that the previous comments had been incorporated successfully. Additional comments were made on the landscaping approach including requests for benches, consideration of lighting, ensuring traditional kerbs are avoided and ensuring trees have enough space to grow and are appropriate species. These further comments have been incorporated into the scheme. The provision of further rationale, as well as sections and views (not simply plans), in the final submission was requested, to ensure the nature of the landscaping is fit for purpose; this is set out in the Design and Access Statement and Landscape Strategy.
Strategic Planning Briefings	Strategic Planning Briefings to Council Members took place in March and August 2026. Members in attendance included the Leader of the Council, Head of Planning, ward councillors and other political members. These briefings enabled the Applicant and design team to provide detailed updates on the proposals and respond to queries around the uses, provision of affordable housing, design quality and engagement process, in advance of submission of the application so that the vision for the site and the detail of the proposals could be clearly communicated.
Pre-Application Planning Sub-Committee Briefing	A briefing was delivered to the Planning Sub-Committee in July 2026 to provide members with a full update on the application in advance of submission and allow the opportunity for questions from Members. The briefing provided details of the shared living use, how the building works in practice and the demand for the shared living units, and the future proofing of the building for conversion to other uses including residential if required, as well as clarifications on the consultation and engagement process.
Ward Councillor meetings	Lowick and Re:shape led several meetings and provided updates to Ward Councillors. Councillors' comments centred mainly on three themes: affordability, impact and engagement. On affordability, questions were raised on the types of tenants likely to occupy the residential and commercial aspects of the scheme, as well as how the scheme would help address nearby vacancy rates. These comments were considered in the design, size, location and layout of the commercial spaces, and retail and commercial assessment work was also undertaken to inform this. On impact and design, they asked questions around the height and daylight/sunlight effects of the tower adjacent to the park, the total population uplift arising from the development, and the nature of the green corridor, and expressed a preference for a greener/less red materiality. On engagement, they asked which community groups are involved and encouraged the team to engage residents' groups as well. Further detail is included within the Statement of Community Involvement.

Engagement and Consultation	Summary
GLA pre-application meeting	A GLA pre-application meeting was held in May 2026 and a meeting with GLA energy/sustainability officers was held in June 2026. The GLA were content with the principle of the proposals for the regeneration of these sites for a mix of uses, including tall buildings, overall. Officers supported the proposed land uses and the site layout/general arrangement. Officers supported the principle of cycle parking in accordance with the recently published Support for Housebuilding LPG, and Re:shape's sustainability aspirations. Detailed comments on design, amenity, public realm, energy strategy etc were provided and have been taken on board in the design development since the meeting.
Community consultation	Re:shape has been engaging local groups as part of its community led placemaking process, and Lowick has led public consultation throughout the pre-application process, which will be ongoing through determination. Please refer to the Statement of Community Involvement and the Community Investment Programme (CIP) for full details. A formal in-person consultation event was held in June 2026. 5,051 flyers were sent out to local addresses. There were 13 attendees and 6 feedback forms completed. Overall, respondents were broadly supportive of the proposals, with the clearest support shown for the proposed housing mix (said to assist younger demographics and alleviate wider housing pressures) and the improved public realm (cited as incredibly important, with requests to plant trees). Views on the proposed building appearance were mixed, with requests for bright colours and aesthetic design to brighten up the area. This feedback has been incorporated into the design and materiality proposed. There were also comments on the need for affordable homes, which are being delivered on site, and the proposed community space was welcomed. Coffee mornings and team meetings have been offered to residents of local buildings in the area and community groups, and an email address was advertised for further comments to be received. Further detail is provided within the Statement of Community Involvement and Community Investment Programme (CIP).
Planning Forum	A public Planning Forum event, to be led by LBH, is scheduled for September 2026, following submission of the application, so that the public has an opportunity to ask questions on the final design and submission material. The timing and context of the session is being agreed with LBH in advance. Site notices have been put up by LBH and Lowick has further advertised the event to optimise attendance.

Summary

- 5.2 The extensive pre-application and community led placemaking process has helped to guide and inform the design. Overall, the principle of development has generally received support throughout, and useful detailed comments have been made to ensure the design responds appropriately to its context and local needs.

- 5.3 The engagement process is ongoing, and feedback continues to be gathered. All feedback received so far has been considered in detail by the design team and through the iterative design process many requests have been incorporated, for example in relation to colour and materiality, tree planting, and housing mix, and elements retained where positive feedback has been received, for example the green corridor, and community and appropriately sized commercial spaces.
- 5.4 A summary of the scheme's design evolution is set out in the Design and Access Statement.

6.0 Planning Policy Context

6.1 This section sets out the planning policy context relevant to the redevelopment of the Site.

National Planning Policy

6.2 The National Planning Policy Framework ('NPPF') (August 2026) sets out the Government's planning policies for England and provides strategic direction on a range of planning matters.

6.3 The NPPF is a material planning consideration in decision making. At the heart of the NPPF is a **presumption in favour of sustainable development**. The aim of the NPPF is to proactively deliver sustainable development to support the Government's housing and economic growth objectives and meet the needs of the country.

6.4 It is supplemented by the Planning Practice Guidance ('PPG') which gives further guidance on how national policy should be interpreted.

6.5 The NPPF states that decisions should support development that makes efficient use of vacant, previously developed and underutilised land and buildings, taking into account the identified need for housing, local market conditions and viability, the availability and capacity of infrastructure and services, the desirability of promoting regeneration and change, and the importance of securing well-designed, attractive and healthy places.

Statutory Development Plan

6.6 The Statutory Development Plan relevant to the site comprises:

- 1 The London Plan (2021);
- 2 LB Haringey Local Plan (2017); and
- 3 Tottenham Hale AAP (2017).

Strategic Policy

London Plan (2021)

6.7 The London Plan was adopted in 2021 and is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop and forms part of the statutory development plan for the Site. Importantly, it includes Policy H16 Large-scale purpose-built shared living, which established the strategic policy context for the delivery of shared living schemes within London. Other policies of relevance include:

- 1 GG1 Building strong and inclusive communities
- 2 GG2 Making the best use of land
- 3 GG4 Delivering the homes Londoners need
- 4 D3 Optimising capacity through the design led approach
- 5 D4 Delivering good design
- 6 D5 Inclusive design

- 7 D6 Housing quality and design
- 8 D7 Accessible housing
- 9 D8 Public realm
- 10 D9 Tall buildings
- 11 D12 Fire safety
- 12 D14 Noise
- 13 H1 Increasing housing supply
- 14 H4 Delivering affordable housing
- 15 H6 Affordable housing tenure
- 16 S4 Play and informal recreation
- 17 G5 Urban greening
- 18 G6 Biodiversity and access to nature
- 19 SI2 Improving air quality
- 20 SI1 Minimising greenhouse gas emissions
- 21 SI13 Sustainable drainage
- 22 T2 Healthy streets
- 23 T5 Cycling
- 24 T6.1 Residential parking
- 25 T7 Deliveries, Servicing and Construction

- 6.8 The London Plan is in the process of being updated, with consultation on a new full proposed draft open until October 2026. An earlier ‘Towards a new London Plan’ consultation also held in 2025. At the current time, the draft holds limited weight, however this will increase as the plan progresses the stages of consultation to adoption. Adoption of the new London Plan is anticipated in early 2028.

Purpose-Built Large-Scale Shared Living LPG

- 6.9 The Large-Scale Purpose-Built Shared Living LPG, adopted February 2024, provides further detail on the application of Policy H16 on the siting and development of such housing to balance this with other housing types, and provides space and facilities benchmarks and good practice to help ensure these developments are designed and managed to be of good quality, safe and inclusive and integrated into their neighbourhood.

Support for Housebuilding LPG

- 6.10 The Support for Housebuilding LPG (2026) provides measures aimed at improving housing viability and deliverability including changes to cycle parking requirements and housing design guidance. The LPG is intended to reinvigorate stagnating housing and affordable housing development, in recognition of London’s acute housing delivery challenges and is now a material consideration in the determination of planning applications.

- 6.11 The LPG enables an amended approach to the current London Plan ‘fast track’/threshold route to affordable housing delivery, with 20% affordable housing, at a 70:30 tenure split weighted towards social rent, being supportable on sites where relevant conditions are met.
- 6.12 The LPG removes elements of previous design guidance that unnecessarily constrain density, including standards relating to dual aspect unit provision and the number of units around a stair core.
- 6.13 The LPG also sets out an updated schedule of cycle parking standards that superseded the standards within the current London Plan Policy T5. The Joint Policy Note released on the adoption of the LPG states that developers and boroughs are urged to utilise the measures to unlock delivery of new homes that are urgently needed across the capital.
Draft/Emerging London Plan
- 6.14 As noted above, a new London Plan is currently being developed to guide London’s growth through to 2050. A full Draft London Plan was released in July 2026, with consultation open until October 2026. Given its current status and the early stage in the consultation process, no weight is currently given to its policies in this Planning Statement, however the draft London Plan offers insight into the direction of travel of the GLA’s policies, supports the optimisation of brownfield sites and delivery of tall buildings in appropriately identified locations, the delivery of shared living, the delivery of affordable homes which meet local mix and tenure needs, good quality design and cycle standards in alignment with the Support for Housebuilding LPG.

Local Plan

- 6.15 The Haringey Local Plan comprises the following documents:
- Local Plan: Strategic Policies (adopted 2013, consolidated with alterations since 2017);
 - Local Plan: Development Management Development Plan Document (DM DPD) (adopted 2017);
 - Local Plan: Site Allocations DPD (SA DPD) (adopted 2017); and
 - Local Plan: Tottenham Hale Area Action Plan (AAP) (adopted 2017).
- 6.16 The key strategic and development management policies of relevance are as follows:
- 1 SP2 Housing
 - 2 SP11 Design
 - 3 DM1 Delivering High-Quality Design
 - 4 DM2 Accessible and Safe Environments
 - 5 DM3 Public Realm
 - 6 DM4 Provision and Design of Waste Management Facilities
 - 7 DM6 Building Heights
 - 8 DM10 Housing Supply
 - 9 DM11 Housing Mix
 - 10 DM12 Housing Design and Quality

- 11 DM13 Affordable Housing
- 12 DM21 Sustainable Design, Layout and Construction
- 13 DM23 Environmental Protection
- 14 DM25 Sustainable Drainage Systems
- 15 DM29 On-site Management of Wastewater and Water Supply
- 16 DM31 Sustainable Transport
- 17 DM32 Parking
- 18 DM38 Local Employment Area – Regeneration Areas.

6.17 The Site sits within the following designations, evidencing its strategic and sustainable location:

- 1 Upper Lee Valley Opportunity Area;
- 2 Tottenham Hale District Centre (southern part of the Site);
- 3 Local Employment Area (northern part of the Site);
- 4 Tottenham Hale Area Action Plan (TAAP, 2017) area;
- 5 Adopted Local Plan Site Allocations (2017) TH5 (Station Square North) and TH6 (Ashley Road South Employment Area);
- 6 Tall building growth area.

6.18 The Tottenham Hale AAP provides the planning framework for the coordinated regeneration of Tottenham Hale until 2032, and includes a vision for the creation of a new District Centre focussed around the station with high-quality urban neighbourhoods, new employment and education opportunities and enhanced connections to the Lee Valley Park and beyond.

Draft/Emerging Local Plan

6.19 LBH released a draft Local Plan in October 2025, which underwent consultation until December 2025. The Draft Local Plan is the first full draft of the New Local Plan setting out the Council's proposed 15-year spatial vision for new buildings and development in the borough, together with a borough-wide framework for placemaking.

6.20 Re:shape submitted representations to this consultation and continues to be involved in the Local Plan process to help shape the policy context and site allocations of relevance to this planning application.

6.21 Within the draft Local Plan, the Site is allocated within THSO3: Ashley Link. The allocation supports comprehensive mixed-use redevelopment including residential, town centre and employment use, to form part of the District Centre and help facilitate improved east-west connections through Down Lane Park and into the District Centre.

6.22 The Site also has the following designations:

- 1 Upper Lee Valley Opportunity Area;
- 2 Tottenham Hale Emerging District Centre (entire site);

3 Placemaking Focus Area: Transform (areas with the greatest placemaking potential, where significant change is planned to deliver new homes, workspaces, public spaces, and infrastructure while respecting valued local features); and

4 Location Potentially Suitable for Tall Buildings;

6.23 We note that in the emerging Local Plan, the Site is removed from the Local Employment Area.

6.24 At present the early draft holds limited weight as the Council is currently collating and analysing the comments received. Having regard to these, it will then prepare and consult on a Proposed Submission Local Plan (Regulation 19) in the second half of 2026. The policies will gain more weight once the Regulation 19 draft is released as the consultation process towards adoption of a new Local Plan continues.

Tottenham Hale District Centre Framework (2015)

6.25 This district centre framework acts as an evidence base to inform the TAAP to allow for the implementation of proposals for the Tottenham Hale District Centre. The framework helps provide an evidence base to form the strategy for development within the Tottenham Hale District.

6.26 The Tottenham Hale District Centre Framework (THDCF) provides design guidance and parameters for the Ashley Road South site (TH6). The vision for this area is that Ashley Road will be a vibrant mix of high-density businesses and homes, delivering a significant quantum of new homes, commercial floorspace and jobs across the ARSM.

Summary

6.27 National, regional and Local Planning policy is supportive of new residential led development which optimises delivery and makes the best use of land in this location.

6.28 Policy supports the provision of higher density development within this location given the Site designations for growth, opportunity area allocation, tall building growth area and proximity to public transport, provision of employment and other supporting infrastructure to provide suitable development to meet the housing demands of the local borough.

7.0 **Planning Assessment**

- 7.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004) this Section considers the acceptability of the Proposed Development against the statutory Development Plan and other material considerations.
- 7.2 The subsequent sections of this Planning Statement provide an assessment of the Proposed Development against relevant policies in the Development Plan having regard to other material considerations.
- 7.3 The key planning issues on which determination of the application are expected to be based are listed below:
- 1 Principle of development;
 - 2 Shared living and housing delivery;
 - 3 Affordable housing statement;
 - 4 Non-residential floorspace;
 - 5 Design and architectural quality;
 - 6 Quality and amenity matters;
 - 7 Landscaping, urban greening and public realm;
 - 8 Transport, parking and servicing; and
 - 9 Energy and Sustainability.

8.0 Principle of Development

- 8.1 The principle of mixed use residential-led development at the Site is supported by relevant national, regional and local planning policy.
- 8.2 The NPPF (2026) promotes the efficient use of brownfield urban land and achieving appropriate densities to meet the need for homes and other uses. It requires development to make optimal and efficient use of previously developed land (Policy L2).
- 8.3 London Plan Policy SD1 states that Boroughs should encourage and deliver the growth potential of Opportunity Areas. Policy H1 Part B 2) states that Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially sites within 800m of a station or with a PTAL of 3-6. Good Growth Objective GG2 of the London Plan promotes the optimisation of land, particularly through the redevelopment of brownfield sites within Opportunity Areas.
- 8.4 The Site is within the Lee Valley Opportunity Area, identified in the London Plan as having indicative capacity for 21,000 new homes and 13,000 new jobs by 2041 and as occupying a strategic growth position with a range of development opportunities for higher density development, and within a GLA Housing Zone.
- 8.5 As noted above, Tottenham Hale has been identified for significant regeneration and growth, much of which has been delivered in recent years, and the area has seen transformational change. Local Plan Strategic Policy SP1 states that the Council will focus Haringey's growth in the most suitable locations and promote growth in identified Growth Areas, including Tottenham Hale. Local Plan Policy DM10 states that the council will support proposals for new housing on sites allocated for residential development, within the Area Action Plans.
- 8.6 The Tottenham Hale AAP provides a number of area-wide policies, including AAP1 which states that development proposals will be expected to provide a range of types and sizes of homes, create inclusive and mixed communities within neighbourhoods, create local economic opportunities, improve and enhance the local environment and adapt to climate change; to promote the positive regeneration of Tottenham. Policy AAP3 part D states that the Council will support proposals which are designed to improve the quality and range of affordable housing options; address housing needs in Haringey; secure a mixed, sustainable community; and increase housing delivery in Tottenham.
- 8.7 The northern part of the Site is subject to AAP allocation TH6: Ashley Road South Employment Area (which covers the wider ARSM masterplan area to the north and east of the Site), for the creation of an employment-led mixed use quarter north of a new District Centre, creation of a new east-west route linking Down Lane Park and Hale Village, and enhanced Ashley Road Public Realm. The southern area of the Site (which is within the District Centre) is subject to AAP allocation TH5: Station Square North for comprehensive redevelopment of the southern end of Ashley Road for ground floor town centres used with a mix of residential and employment above, forming part of the new District Centre.
- 8.8 The Site is also subject to an allocation in the draft Local Plan: THSo3: Ashley Link. The allocation supports comprehensive mixed-use redevelopment including residential, town centre and employment use, to form part of the District Centre and help facilitate improved

east-west connections through Down Lane Park and into the District Centre. The Proposed Development delivers the east-west connection in the form of the Green Link and will deliver high-quality residential development as well as commercial and community floorspace.

- 8.9 These planning designations clearly indicate that the Site is within a highly sustainable and accessible location with clear potential to accommodate significant development. The underutilised brownfield site has been vacant for a long-time following clearance and stalling of progress subsequent to the grant of the extant permissions, and the Proposed Development will optimise its potential to deliver new homes alongside commercial and community floorspace.
- 8.10 The Site benefits from extant planning permissions, as set out in Section 3.0 which deliver a substantial residential development. These permissions were implemented in 2023 and remain extant. Through these applications, it has been demonstrated that the regeneration of this highly sustainable brownfield site, for mixed use proposals bringing forward living accommodation and other town centre uses, is acceptable and that such development accords with policy and wider aspirations for the Site.
- 8.11 The principle of the redevelopment of the Site for residential-led development is clear and has been established through various levels of strategic and local policy, and previous applications, weighs in support of the Proposed Development.

Housing Delivery Test

- 8.12 Updated Housing Delivery Test results for 2024 and 2025 were released in August 2026. This represents the most up-to-date assessment of housing delivery and should be used for decision-making purposes (as set out in Annex D of the NPPF).
- 8.13 Where delivery falls below 75% of the requirement over the previous three years, an evidenced unmet need for housing is deemed to exist, the consequence of which includes the presumption in favour of sustainable development. In the August 2026 NPPF, the result is expressly treated as an evidenced unmet need and the presumption is strengthened. LB Haringey's HDT 2025 measurement is 71%.
- 8.14 The previous iteration of the NPPF applied a 'tilted balance' in this scenario, through the former NPPF Paragraph 11d. The August 2026 NPPF replaces this with a **presumption in favour of sustainable development**. Policy S4 of the NPPF now provides a clear supportive decision-making balance in favour of sustainable development within settlement boundaries, which should be engaged for all development proposals in all locations, where the proposals accord with an up-to-date development plan and the decision-making policies within the NPPF.
- 8.15 A sub-75% HDT score also adds further necessity to the presumption, to assist in meeting unmet housing need.

9.0 Shared Living and Housing Delivery

- 9.1 This section sets out the shared living element of the proposals, the excellent suitability of the Site and local area for the addition of a shared living development that can add to the housing mix in Tottenham Hale, and the scheme's compliance with London Plan Policy H16 and the requirements of the Large-Scale Purpose-Built Shared Living (LSPBSL) LPG.

Suitability and Need for Sui Generis Shared Living Use

- 9.2 Shared living, or Purpose-Built Shared Living as described in the London Plan, is non-self-contained market housing with shared communal amenities. Shared amenity spaces encourage social interaction amongst residents, through the provision of well-designed shared living spaces including large kitchens, cinema rooms, gyms, libraries, co-working spaces and private dining rooms. Each resident's private space consists of a room with an en-suite bathroom, a kitchenette and integrated storage space.
- 9.3 The London Plan (2021) establishes the policy basis for the development of shared living developments on the Site. The London Plan and supporting LPG are clear that shared living is a housing product which can meet local needs and contribute towards the overall supply of housing, as discussed further below.
- 9.4 London Plan Policy H16 seeks to ensure that shared living developments are of acceptable quality, well-managed and integrated into their surroundings by setting criteria for proposals. The LSPBSL LPG provides guidance to support Policy H16. There is therefore a well-established and robust policy basis for the consideration of shared living schemes within London.
- 9.5 We note there are no specific shared living policies within the LBH Local Plan.
- 9.6 The Proposed Development represents a bespoke shared living development which has been specifically designed for this function, and this approach is reflected in every aspect of the design. The proposed shared living block (Sui Generis use) comprises 522 units. Of the 522 units, 53 (c.10.1%) are DDA Wheelchair Accessible units.
- 9.7 The shared living block achieves high standards of design, in accordance with Policy H16 part A (1). The high standards of design are met by minimum room sizes of 20sqm, the variety and quality of amenity spaces available for residents both internally and externally, and efficient layouts, enabling a high specification of operational management within the building. The form, massing and architecture of the building have also been carefully developed in response to pre-application feedback from LBH Officers and the Quality Review Panel, to ensure that it responds to the area and is of good quality.
- 9.8 H16 Part A (2) requires shared living development to contribute towards mixed and balanced neighbourhoods. A Shared Living Needs Assessment has been prepared to evaluate the appropriateness of delivering shared living accommodation in Tottenham and includes demographic analysis; findings of local in-person engagement; a review of planning activity; and an affordability assessment demonstrating that shared living offers a comparatively accessible option for single-person households.

- 9.9 The assessment confirms that there is limited existing provision and only a modest pipeline of shared living developments, meaning it is not considered that the development will give rise to an overprovision of this type of housing within this area.
- 9.10 There are a significant number of households living in shared accommodation, including HMOs and the rate of formation of one-person and multi-adult households is expected to increase over the next decade, while the rate of increase in the number of families with dependent children slows. The population of the local area is therefore well-aligned to the typical socio-demographic make-up of shared living tenants.
- 9.11 Further, the demographic analysis shows that there is a high proportion of working-age residents and single adults in the area, characteristics of typical occupiers of shared living units who seek shorter tenancy lengths (a minimum tenancy length of no less than three months, compliant with part 5 of H16). The assessment concludes that the introduction of shared living will be within a balanced and diverse residential environment, representing an appropriate addition to the local housing mix which would broaden housing choice, respond to demand/pressures in the local rental market and contribute to the character of the neighbourhood, alongside the larger and family sized C3 units being delivered as part of the scheme. Please refer to the Shared Living Needs Assessment for further details.
- 9.12 The LPG requires shared living developments to be accessible and inclusive. Re:shape is committed to delivering development that supports the long-term integration of shared living within Tottenham Hale and supporting resident wellbeing, inclusion and positive community engagement. To support integration, in line with the guidance, publicly accessible commercial and community floorspace are provided at ground floor level. These uses create welcoming active frontages and are visible/accessed from the public Green Link route to encourage use by the existing/wider community. Please refer to the Operational Management Plan for further details.
- 9.13 H16 requires (3) shared living development to be located in an area well-connected to local services and employment by walking, cycling and public transport. As set out above in relation to the principle of development, the Site is considered to be within a highly sustainable and accessible location with clear potential to accommodate significant development in close proximity to the District Centre and Tottenham Hale Station. It has a PTAL of 5. The Site is located within a few minutes' walk of Tottenham Hale station, as well as a number of bus stops, and has excellent pedestrian and cycle accessibility locally. The development also supports the use of cycling through the provision of safe and secure cycle parking, as well as an opportunity for shared cycles, and temporary visitor parking across the Site.
- 9.14 The Site is an optimal location for shared living in terms of its location and character. This has been highlighted in pre-application discussions. However, there are no other Sui Generis shared living facilities in the locality. Only one other shared living development has been approved in LB Haringey to date, and this is located in Wood Green, over 3.5km away. The proposed shared living homes will make an important contribution towards providing a more mixed and balanced local community and will not lead to an over concentration of purpose built shared rental housing and/or smaller sized homes in Tottenham Hale or the borough. Detailed assessment of the size and makeup of the existing residential provisions in the area has been analysed throughout the pre-application process.

- 9.15 Part 9 of the LPG details that where a site is suitable for incorporating other types of development in addition to the LSPBSL, on-site provision of C3 affordable housing should be considered as the affordable provision of the scheme. The scheme includes delivery of on-site affordable housing, please refer to Section 10.0.

Contribution to Housing Delivery

- 9.16 In recognition that shared living contributes an element of housing choice, London Plan Policy H1 paragraph 4.1.9 states that non-self-contained housing counts towards meeting housing targets on the basis of a 1.8:1 ratio, with 1.8 units being counted as a single home.
- 9.17 The proposed shared living block, which provides 522 units, will therefore contribute 290 homes towards meeting local housing targets in a location identified in the Local Plan, Tottenham Hale AAP, draft Local Plan and the relevant site allocations as being suitable for the delivery of housing, and contributing to the housing delivery sought through the GLA Housing Zone designation.
- 9.18 The delivery of new housing of different forms, and the contributions of this to housing delivery in the context of acute local and strategic need is considered to adhere to national, regional and local policy.

Management

- 9.19 Unlike conventional C3 housing, a key component of the policy requirements for shared living developments is the need for ongoing management requirements. Policy H16 requires shared living developments to:
- Be under single management;
 - Ensure all units are for rent and provide minimum tenancies of three months; and
 - Ensure that a Management Plan is submitted with the application.
- 9.20 The shared living units will be under single management, and all units will be for rent with minimum tenancy lengths of no less than three months, and a Shared Living Operational Management Plan has been submitted which contains further details.

Communal Facilities

- 9.21 Part A (6) sets requirements for provision of sufficient communal facilities and services and (7) requires private units to provide adequate living space. Each resident's private space consists of a bedroom with an en-suite bathroom, a kitchenette, and integrated storage space. Each unit provides well designed, high-quality functional living space in a well-considered layout, but in line with Policy H16 is not a self-contained home. Shared internal amenity space provision is distributed throughout the block to promote use and to be accessible to all, and includes communal kitchen and dining spaces, lounges, a cinema room, working spaces, and a gym. Shared external amenity space is also provided, in the form of the roof terrace and ground floor courtyard garden for residents. The compliance with Policy H16 is detailed further in Table 9.1 below.

Functionality and Quality

- 9.22 Policy H16 requires private units to “provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes.”
- 9.23 The architect for the scheme, DLA Architecture, has designed the layout of the individual studios taking account of their in-depth experience of designing and delivering shared living schemes across London. This experience has informed the size and layout of the studios to ensure that they not only function effectively but also provide a high quality of accommodation which are desirable to residents.
- 9.24 It should be noted that the size of the studios is not the only consideration in assessing the functionality of the space. The layout and design are of equal importance. In this regard each home will provide a sleeping, living and kitchen area with built in furniture specifically designed for the studios. In addition, hanging and storage space is provided and each room has an en-suite with shower.
- 9.25 The design of the studios maximises useable space and storage. Studios have been designed to ensure appropriate levels of daylighting and sunlight and to avoid over-heating, these matters are discussed in the relevant technical assessments and summarised in the relevant sections of this Planning Statement below.
- 9.26 The compliance with Policy H16 is detailed further in Table 9.1 below.

GLA Large Scale Purpose Built Shared Living LPG compliance

- 9.27 The shared living offer has been delivered in line with the GLA LSPBSL LPG, as well as Re:shape’s experience and operational understanding of the use from their other successful developments.

Table 9.1 Scheme compliance with LSPBSL LPG criteria

LPG criteria	Details/scheme requirement	Scheme compliance
Shared internal communal amenity space, comprising:	Kitchen floorspace - 0.5 sqm per resident, to include one cooking station per 15 residents. Equates to 261sqm and 35 cooking stations (including hob/ovens and sinks). (Required).	Provides c.310 sqm and 35 cooking stations (including hobs and sinks). The kitchen floorspace is distributed across the 7 th and 21 st floors. Residents have access to a roof garden at the 7 th floor, where they can cook and use the seating areas inside or outside. The necessary requirements are achieved.
	Dining floorspace - Two dining spaces per cooking station, or number of dining spaces = 15% of total residents. Equates to 70 dining spaces. (Required).	Provides 115 dining spaces. The dining areas are provided at the 7 th and 21 st floors in close proximity to the cooking facilities. The necessary requirements are achieved.

	Internal communal space, i.e. living rooms/lounges (required), and other recreation of entertainment spaces for the exclusive use of residents without a charge (optional).	The communal spaces are distributed throughout to make them as accessible as possible to all residents and include lounges, co-working space, cinema room, private event/games rooms, a gym and wellness/fitness studios.
	Workspace - common work areas at no extra cost to residents (optional).	Provides 240 sqm of workspace for residents to utilise, which is only an optional requirement.
	Overall total internal communal amenity space provision, including the above internal amenities - requirement is for 4sqm per resident up to 100, 3sqm per additional resident from 101 - 400, and 2 sqm per additional resident from 401. Equates to 1,544 sqm.	Provides 1,547 sqm, exceeding the target requirement for internal amenity space.
Other shared facilities, that do not count towards shared internal communal amenity space provision:	Laundry and drying facilities - 1 washer and 1 dryer per 35 residents (required). Equates to 15 washers and 15 dryers.	Provides 15 washers and 15 dryers (stacked) at ground floor level to be easily accessible by all residents, meeting the necessary requirements.
	Toilets - provided in proximity to communal spaces (required). No specific figure for provision.	Provides 2 DDA toilets located within the shared amenities at ground floor in line with this requirement.
Shared external communal amenity space (required) - terrace/gardens.	1sqm per resident up to 400, and 0.5sqm per additional resident from 401. Equates to a requirement of 461sqm.	Provides c.1,045sqm in total, comprising a c.215sqm courtyard garden at ground floor, c.730sqm roof garden/terrace at 7th floor and c.100sqm terraces at 21st floor. External amenity spaces significantly exceed the required quantum.
Cycle parking	0.75 spaces per person. Flexibility may be applied based on site location/provision of onsite shared bicycle schemes. (Required).	Long stay cycle parking for the shared living block is provided in accordance with the Support for Housebuilding LPG, which seek for 0.6 spaces per unit for shared living developments (Band 2) but allow for flexibility in implementation. A total of 252 long stay cycle parking spaces and 14 short stay spaces are proposed for the shared living block.

		The development also provides two areas dedicated for Lime/shared e-bike parking, providing 24 spaces. Please refer to details in Section 15.0.
Car parking	Car-free, noting London Plan Policy T6.1 requires blue badge holder parking.	Provides 1 wheelchair accessible space provided within the public realm opposite the shared living building entrance. Please refer to section 15.0 for details.
Private units	Unit size - no less than 18sqm and no more than 27sqm for standard units and a generally expectation for accessible units of between 28 and 37sqm to accommodate ease of access to necessary amenities. Drawings demonstrating how accessible units have been designed in accordance with Part M of the Building Regulations and confirmation they have been reviewed by an inclusive accessibility expert is requested.	All standard units are between just over 20sqm, and 27sqm, with the exception of three studios of 28sqm, 29sqm and 32sqm due to layout constraints and floorplate configuration only. The units provide adequate functional living space and layout and are not self-contained homes. All accessible units are between 26-30sqm. Most units are above the minimum floorspace, and all units are well designed and allow appropriate space and provisions for disabled users. The building has also been designed to ensure accessibility and inclusivity throughout. The Design and Access Statement includes details of the unit types and provides further detail confirming the accessibility of the units, shared amenities and wider building. Accessible units have been checked, and it is confirmed that the 29 units smaller than 28sqm do comply with Part M(3) requirements.
	Private unit amenities - indicatively expect double bed, bedside cabinet, storage space, seating/dining area, small kitchenette, bathroom with shower.	Please refer to the Design and Access Statement for details of a typical studio and the private unit amenities provided.

9.28

Paragraph 3.11.3 of the LPG states that private units should be designed to receive adequate levels of daylight, sunlight, ventilation, outlook and privacy, and must be protected from internal and external sources of noise, to ensure good-quality living conditions. The height,

scale, massing, layout, fenestration, choice of materials, and other design and architectural considerations have all thoroughly considered the quality and amenity of the living environment for residents of the shared living accommodation. A summary of the technical details in relation to quality and amenity matters is set out at Section 14.0 of this Planning Statement. Further detail is provided across relevant assessment documents.

Summary

- 9.29 The Proposed Development is in accordance with the definition and policy requirements for shared living and will make a positive contribution towards housing need and the supply of a range of housing types, as well as offering a well-designed scheme that will facilitate social interaction between residents, helping to build a new community in the local area.

10.0 Affordable Housing Statement

- 10.1 This section sets out the details of the affordable housing which will be delivered as part of the Proposed Development. The Proposed Development delivers a ‘fast track’ proposal that includes over 35% affordable homes (36% by NIA and habitable room) and exceeds policy requirements in respect of the proposed tenure, and quantum of family homes.

Quantum and Tenure

- 10.2 The Proposed Development will deliver 36% affordable homes on a habitable room and NIA basis.
- 10.3 London Plan Policy H16 requires developments to make a payment in lieu contribution towards the provision of off-site affordable housing. The LPG details that where a site is suitable for incorporating other types of development in addition to the LSPBSL, on-site provision of C3 affordable housing should be considered. However, on-site provision of conventional C3 affordable housing achieves the scheme’s affordable housing requirements and enables the scheme to follow the ‘fast-track’ viability route.
- 10.4 The on-site affordable housing will comprise 87 new affordable homes, which will be delivered as 100% social rent homes, exceeding Local Plan Policy SP2 policy requirements that seek a 60:40 target split of low-cost rent and intermediate tenures. This provision responds to the tenure for which there is understood to be most need in the borough and represents a significant planning benefit for the scheme

GLA Equivalency Calculation

- 10.5 The GLA adopted the Accelerating Housing Delivery Planning and Housing Practice Note (“Practice Note”) in December 2024. The Practice Note was adopted in recognition of the challenges currently facing housing delivery in London in the short term and introduces additional measures to support housing delivery, with the focus on increasing the provision of affordable homes and wider housing delivery, including social rent homes.
- 10.6 The Practice Note recognises the growing need for social rent and allows schemes delivering 100% social rent to qualify for the Fast Track Route (“FTR”) with a lower overall level of affordable housing. This is acceptable where the amount of social rent provided is ‘equivalent’ to the policy requirement under the local plan’s standard tenure split. This approach is also reflected in the draft London Plan.
- 10.7 In this case, the equivalency test is not being used to reduce the overall amount of affordable housing. Instead, it is used to demonstrate that providing the proposed 36% affordable homes at 100% social rent is equivalent to delivering 35% affordable housing with a policy-compliant affordable housing mix.
- 10.8 Using the overarching methodology, when providing the whole affordable building as social rent, the equivalent level of affordable housing is calculated to be 52% by both NIA and habitable room
- 10.9 GLA pre-application feedback confirmed the principle of the equivalency calculation, and Officers were content with the calculation. The overall percentage has increased from the position presented at pre-application stage, reflecting the incorporation of LBH’s design

comments and the finalisation of the unit mix. In particular, the revised scheme provides a greater proportion of affordable housing physically, increasing from 35% to 36% by habitable room and from 34% to 36% by NIA.

Dwelling mix

- 10.10 The proposed dwelling size and mix have been developed to provide a good mix and balance of residential units having regard to local need and site-specific characteristics.
- 10.11 The mix of the affordable homes seeks to maximise the proportion of family sized units, following pre-application discussions with LB Haringey housing team regarding the need for more family homes within the social rent tenure. These homes will contribute towards meeting the area of greatest housing needs of the Borough. However, it also includes a suitable proportion of one-bedroom and two-bedroom units which reflects the Site's proximity to a major transport node.
- 10.12 The proposals deliver the following units:
- 14 x 1B2P units (16%);
 - 51 x 2B4P units (59%);
 - 12 x 3B5P units (14%); and
 - 10 x 4B6P maisonettes (11%).
- 10.13 No. 11 units are delivered as wheelchair accessible homes, achieving the minimum 10% requirement.
- 10.14 The Proposed Development will offer good housing choice and that the proposed accommodation will be mixed and balanced by size and typology, guided by its highly accessible and District Centre location, and discussions with the housing team. The Proposed Development is therefore compliant with London Plan Policy H10 (Housing size mix), Policy SP2 (Housing) in the adopted Local Plan, and Policy DM11 (Housing mix) in the adopted Haringey DPD.

Residential Quality

- 10.15 The affordable housing block has been designed to optimise the delivery of new homes in this high accessible and ensure they are of good quality and enable good residential amenity. Measures incorporated to provide quality homes, in line with local and strategy policy requirements are as follows:
- 1 The affordable homes will all meet or exceed Nationally Described Space standards.
 - 2 The building has been designed with deck access, to create dual aspect homes and improve daylight and sunlight.
 - 3 All homes include private balconies or rear gardens, that meet or exceed policy requirements and space standards.
 - 4 The rear gardens are bordered by a green fencing, to improve visual amenity and greening.

- 5 A row of ten two-storey maisonette homes, each with their own front doors accessible from the new central route through the Site are provided, improving active frontage and natural surveillance, and offering different house types within the development.
- 6 The maisonettes have front gardens, protected by a metal railing and planting, giving privacy to the ground floor homes.

Wheelchair Accessible Parking

- 10.16 No. 11 wheelchair accessible parking spaces are provided immediately adjacent to the affordable housing block. London Plan Policy T6.1 requires 3% of the total units to be supplied with a wheelchair accessible space, with safeguarding for an additional 7% of space to be delivered in due course. However, following pre-application discussions with LB Haringey housing team, this has been increased to 10% from day one, to increase the number of units that are able to benefit from an accessible parking space.
- 10.17 The distribution of blue badges and management of these spaces will be the responsibility of the Registered Provider or Housing Association operating the affordable homes.

Summary

- 10.18 The development will add to the overall number of affordable homes across Tottenham Hale and is therefore considered acceptable in the context of policy requirements and objectives relating to affordable homes. Discussions with the housing team have shaped the proposals to ensure the affordable homes delivered address genuine housing needs in the Borough; the proposals have been updated to incorporate all feedback received, mainly the provision of private gardens, increased family and wheelchair accessible provision, and locating blue badge parking in close proximity to the homes.

11.0 **Non-residential Floorspace**

- 11.1 This section sets out the details of the non-residential element of the proposals, comprising commercial floorspace which activates key corners of the Site, and a community floorspace that can be utilised for a range of local groups and charities to hold community events. These uses will bring vibrancy, activity and security to the ground floor of the development.

Commercial Floorspace

- 11.2 The extant consents across the Site were approved some time ago, in 2018 and 2020. There have been significant changes in the local economic context in the intervening years, including “economic drag” following Brexit and knock on effects of the Covid-19 pandemic and the Ukraine war. Any proposed commercial development design today is brought forward in a different market than the point at which the policy and extant consent were developed.
- 11.3 The extant consents included 170sqm commercial floorspace for A1/A3/B1 uses (within permission ref. HGY/2019/0108, allowed at appeal under ref. APP/Y5420/W/19/3232707) – there were no restrictions on the flexibility of the use and so there were no conditions that would have specifically required any of the floorspace to be delivered as B1 uses. The southern element of the wider permission that also included the Cannon Factory, also approved between 600-725sqm of A1, A3, B1 or D1 floorspace across buildings 2 and 2A, which were located on the former Ashley House portion of the site (under Outline permission ref. HGY/2016/4165). The RMA (ref. HGY/2018/2353) then proposed, as part of the detailed design for the southern Ashley House site only, 387sqm D1 floorspace only, and 279sqm, of A1/A3/B1/D1 floorspace. This was not strictly controlled by conditions. The only commercial use condition relevant was a restriction of up to 450sqm of A1 and up to 300sqm of A3 floorspace be allowed across both part of the development, however these totals would enable all proposed floorspace at the Ashley House site to be delivered as A1 or A3. We also understand that the B1 employment floorspace was anticipated to be directed towards the former Cannon Factory site.
- 11.4 The extant consents therefore allow for flexibility in the floorspace associated with the Ashley House site, permitting use as retail premises, a café or restaurant, or a small office floorspace. Given the specific locations and the shapes and sizes of the previously approved commercial units, and that the units fall well within the use class thresholds allowed by the permission, they would most likely have been delivered as small retail or café type uses, rather than strictly employment use.
- 11.5 The Site is fully removed from the Local Employment Area designation in the emerging Local Plan, which reevaluates the previous site allocations, suggesting a direction of travel away from employment and more to wider town centre uses
- 11.6 The draft allocation THSA03: Ashley Link states that residential land uses and town centre and employment uses will be acceptable and highlights that the site forms part of the newly configured District Centre. The allocation states that town centre and employment space should be maximised, which encourages some diversification of uses.
- 11.7 The fact that the entire site is contained within the amended District Centre boundary in the draft Local Plan promotes the delivery of new, expanded and complementary town

centre uses and a mix of uses which ensure activity, vibrancy and security at all times of day and helps anchor the district centre, as well as the comprehensive delivery of large sites, and a high-quality placemaking approach, rather than a binary quantum of ‘employment’ floorspace. The new emerging policy position is a more up to date barometer of the direction of travel for the intended mix of uses anticipated at this site.

- 11.8 The proposed commercial floorspace needs to respond to market demand and be commercially deliverable in order to optimise the potential for lettings and reduce the likelihood of vacancy, which would have negative impacts on the emerging expansion of Tottenham Hale District Centre. To ensure the success of the District Centre in the coming years, new development must be occupied as efficiently as possible, to help enable the economic benefits of the development to be triggered and create a lively and attractive area, in turn appealing new residents, visitors and businesses.
- 11.9 A Regeneration Area is the most flexible tier of the hierarchy of employment designations within LBH Local Plan, as it can include uses appropriate in a mixed-use development, such as small ‘walk-to’ retail, community and residential uses (having regard to London Plan town centre and retail policies). The supporting text at paragraph 5.1.4 states that a progressive release of surplus land (including Employment Areas) will be carried out to facilitate urban regeneration, where local employment areas are no longer suitable for industrial or other employment generating uses. Paragraph 5.1.6 notes that new development offers the opportunity to ensure new floorspace is better tailored to meeting changing economic needs. Paragraph 6.4 also acknowledges that mixed-used development offers an opportunity to respond to and overcome viability issues, providing floorspace for business whilst delivering other uses that support sustainable communities such as housing and social infrastructure.
- 11.10 On this basis, we consider the policy position acknowledges that there will be changing circumstances over time in the borough and while employment generation and commercial floorspace is important, to ensure the delivery of mixed-use development and encourage businesses to grow in Haringey, the mechanistic retention of frequently non-viable and unattractive employment floorspace is not necessary, where good quality mixed-use developments, including some commercial floorspace, that can better respond to market context and local needs, can be delivered.
- 11.11 AND London has undertaken detailed market analysis and a review of viability matters, which shows a challenging local market with reduced demand for employment floorspace, low rents, slow absorption rates, void risks and increased competition and forthcoming supply. These matters are relevant to ensuring that a realistic and maximum viable commercial proposal is brought forward. AND’s research found:
- 1 Localised commercial space vacancies in new-build units;
 - 2 Constrained light industrial market with demand for small units;
 - 3 Tight office market with limited momentum;
 - 4 A well-established workplace market with creative space at near-full capacity;
 - 5 A strong pipeline which will intensify future competition (e.g.: almost 4,000sqm coming forward within two years at the Ferry Island, The Hale and 2 Berol Yard

developments), which will strengthen overall activation, but intensify competition in a micro-market already experiencing vacancy;

- 6 Strong demand for small, high-quality retail units and a particular local appetite for active ground floor uses, with preferences centred around food and beverage, convenience retail and community facilities;
- 7 A potential gap identified for specialist food retail, such as greengrocer, bakery or delicatessen;
- 8 Community facilities, especially serving young adults and students, are sparse.

- 11.12 Further detail is set out in the submitted Commercial Strategy, which provides a detailed assessment of the retail and commercial market locally, and the recommendations for the Site, in order to optimise opportunities for lettings.
- 11.13 All of these factors point to a need to reduce the commercial floorspace approved within the extant consent, in order to align with genuine market demands and complement the existing and approved supply of floorspace locally. This will offer an optimal strategy to encourage lettings of the commercial floorspace, which aligns with LBH's aspirations in the Shaping Tottenham document and also assists with placemaking.
- 11.14 We note that the extant consent was undeliverable which led to the previous owner's sale of the site. The permission was implemented in 2023, but the scheme was not viable, in part due to the quantum and configuration of commercial space. The forthcoming proposals enable the opportunity to revisit the development to enhance the quality of the commercial floorspace and improve its deliverability. It is in neither the Council's nor the new owner and developer's interest to deliver a mixed-use development repeating the commercial floorspace of the extant consent, which will remain vacant.
- 11.15 The assessment of the commercial market and proposed strategy in line with the above has driven the Proposed Development's inclusion of 230sqm of commercial floorspace split across two units. The commercial units occupy the corner positions fronting Ashley Road, joining the established cluster of high street units and benefiting from consistent footfall. Dual-aspect frontage onto both Ashley Road and Ashley Link maximises visibility and lettability.
- 11.16 The size, shape and layout of the units, with a square layout, dual-aspect frontage, shell and core specification, and 4m ceiling height are specifically designed for a range of high street uses that add to, rather than repeat, the existing local offer and uses that have and continue to come forward as part of the regeneration of the district centre. The target occupiers are most likely to include a bar or café, bakery, specialist grocery or delicatessen, in line with the identified gap in the local commercial market and public appetite for these uses which will offer attractive and useful local amenities.
- 11.17 This application seeks for the floorspace to be labelled 'Class E' to enable flexibility as to how the units can be delivered and let in the future, to optimise opportunities for lettings. A number of uses would be suitable, falling within Class E more widely.
- 11.18 The commercial floorspace could also be let as affordable commercial/retail units, to attract local businesses and SME, and also optimise the letting potential and long-term occupation, and reduce risk of vacancy. Further information is provided in the Commercial Strategy.

- 11.19 The sustainability credentials of the proposed floorspace are also improved and delivered to modern standards, which many occupiers now require when letting floorspace in new developments. Energy matters and sustainability are at the forefront of informing Re:shape's developments and commercial strategy, and BREEAM Excellent will be achieved, exceeding LBH Policy SP4 (2017) which requires only 'very good'.
- 11.20 Overall, the commercial space ensures activation at key locations within the development and provides activity, vibrancy and security through the public route through the site, drawing people into the public realm within the Proposed Development, and through to the park. The proposals will be a qualitative enhancement on the previous commercial offer and improve the deliverability of the floorspace and wider scheme.

Policy DM38 Assessment

- 11.21 Local Plan Development Management DPD (July 2017) Policy DM38 requires an assessment of the commercial, specifically employment, provision against a number of policy criteria for sites within a Local Employment Area – Regeneration Area. The northern part of the site falls in this designation.
- 11.22 The Local Plan was adopted in 2017, prior to Covid-19 pandemic, and prior to the London Plan's adoption in 2021. The market and land use objectives are now very different to those which existed at the time of the formulation of the Local Plan (2017) policies.
- 11.23 Less weight should be attributed to some of the 2017 employment policies where the realities of the market have changed substantially given the events, and impact these have had on the economy, that have occurred since the adoption of these policies, nearly ten years ago. This is especially relevant in the context of more recent strategic policy having been adopted via the London Plan, which directs 'good growth' and a mix of uses appropriate to garner this growth, and encourages this to be delivered through a design-led approach to site optimisation and capacity (Policy D3), which has been a key driver of the Proposed Development.
- 11.24 The Site does not fall entirely within the current employment designation, and under the emerging draft Local Plan, the whole site is no longer allocated as a Local Employment Area at all. As noted above, the extant consent delivered 449sqm of commercial floorspace within the Ashley House part of the site, however this was approved flexibly, as A1/A3/B1, and would be able to be used for a variety of uses such as retail or food and beverage. It is highly likely that no employment floorspace would have been delivered at the former Ashley House site under the extant consents.
- 11.25 Notwithstanding, we summarise the scheme's compliance with Policy DM38 criteria below for completeness. It is considered that the proposals are in compliance with Policy DM38.

Table 11.1 DM38 Policy Compliance Summary

Policy criteria	Summary of scheme compliance	Supplementary documents
a) Maximise the amount of employment floorspace to be provided within the mixed-use scheme	The quantum of commercial floorspace has been maximised considering the level of floorspace that can be appropriately marketed and let in Tottenham Hale, and in response to the	Commercial Assessment, prepared by AND London

Policy criteria	Summary of scheme compliance	Supplementary documents
	site's precise location within the wider allocation, district centre and ARSM. The proposed commercial floorspace is provided at the size, shape, layout and location within the development (on the corners of Ashley Road) to optimise its deliverability, reduce the likelihood of vacancy that would blight the development, and ensure it contributes to the vibrancy, activity and security of the site. The floorspace is applied for flexibly to enable it to be operated as small employment floorspace, or a café, or retail facility depending on the needs and demands for commercial space in the area. This also maximises its deliverability. Finally, as required by the policy criteria, it is supplied as part of a mixed-use development, with other uses including affordable homes and shared living. The commercial spaces on the corners of Ashley Road will anchor the District Centre, maximise active frontage at the best locations and offer employment opportunities.	
b) Provide demonstrable improvements in the site's suitability for continued employment and business use, having regard to:		
(i) The quality, type and number of jobs provided, including an increase in employment densities where appropriate	The previous use at the site comprised limited floorspace with a low employment density. The extant consent proposed increased levels of employment and commercial floorspace, however very little of this was provided at the Ashley House site. The consent was implemented and then was not found to be deliverable, to the point where the site had to be sold. The new proposals therefore provide increased employment density and a high-quality space that will be delivered, which better responds to the needs and market in this area.	Economic Statement, prepared by Lichfields (Economics)
(ii) Flexibility of design to enable adaptability to different business uses over the lifetime of the development	The floorspace is proposed as two small rectangular units at ground floor level, which is considered to be the most optimal location for commercial floorspace on this site. It will be designed to high quality, modern	Design and Access Statement, prepared by DLA Architecture

Policy criteria	Summary of scheme compliance	Supplementary documents
	standards, which is now seen as a requirement for those taking lettings in new build schemes. The simple layout and concentration of the spaces in a single location enhance its adaptability for different commercial uses over time. It has its own entrance and servicing and can function independently from the rest of the building which bolster this flexibility.	
(iii) Environmental quality of the site	The proposed floorspace will be delivered to BREEAM Excellent standards, considered top-tier best practice for the delivery of sustainable non-residential floorspace. Operational carbon will be reduced and energy efficiency optimised in the fit out of the scheme to ensure an environmentally friendly development. Indoor air quality, lighting and thermal comfort for users will be optimised.	Sustainability Statement, prepared by Carbon Climate Certified
Make provision for an element of affordable workspace where viable	The commercial units are not expressly proposed as affordable workspace, as they are most anticipated to be let as a café or small retail space. The development includes an element of community floorspace which is proposed alongside the commercial as part of the non-residential offer.	Commercial Assessment, prepared by AND London
Ensure an appropriate standard of amenity for the development's users and neighbours, particularly where new residential floorspace is introduced as part of a mixed-use scheme	The site is no longer a location of industrial uses, given the District Centre location and the extensive residential accommodation within the surroundings. On this basis, it is unlikely to be substantially noise or dust generating. The massing of the development has been reviewed extensively to ensure daylight/ sunlight amenity is well considered. The commercial floorspace will offer a welcome local amenity to residents and visitors and will not negatively impact their standards of amenity.	Design and Access Statement, prepared by DLA Architecture Other relevant assessments considering amenity matters
Not conflict with or inhibit the continued employment function of the site and nearby employment sites	The previous use was demolished in 2023 and has not since been replaced. The site is located at the edge of the District Centre and therefore the commercial use is relevant and	Planning Statement, prepared by Lichfields

Policy criteria	Summary of scheme compliance	Supplementary documents
	anticipated within such a location and will not conflict with other uses proposed nearby. The surrounding sites, such as Berol House, 2 Berol Yard and The Gessner, include some employment floorspace, which the flexible commercial floorspace at the former Ashley House site will complement, to bolster the vitality and viability of the District Centre as a whole.	
Be designed to enable connection to ultra-fast broadband	The development will be able to connect to utilities such as ultra-fast broadband in due course.	N/A

- 11.26 We consider the proposals respond clearly to the requirements of Policy DM38, as well as the objectives of other policies across the adopted and emerging Local Plans, such as the AAP and emerging site allocation, and also the Shaping Tottenham regeneration strategy document.
- 11.27 We note that the supporting text to Policy DM38 seeks confirmation that the maximum viable commercial floorspace has been proposed. Notwithstanding the above in regard to the appropriate level of space that is included in the proposed buildings, as part of considering the deliverability of the proposed scheme, the Applicant has reviewed all options to increase the available space within the constraints of the site. The Applicant has undertaken initial sensitivity testing of the viability of the development with the inclusion of a basement, which could potentially increase available floorspace for commercial at ground floor level. This review concluded that the significant impact on build costs in order to implement a basement will make the scheme less viable and the additional costs, as well as significant sustainability impacts, is not justified.
- 11.28 Firstly, the ground floor plane has been optimised for commercial floorspace, as well as making space for necessary requirements relating to plant, sprinkler and attenuation tanks, bin stores, lifts and stair cores, commercial cores, entrances, servicing and back of house requirements. The available space for commercial use at ground floor level has been maximised and the layouts have gone through an iterative process to ensure all efficiencies in relation to plant and back of house space are reduced wherever feasible. Plant, cores and servicing requirements serve the whole building and therefore reducing the proposed uses within the building would not release additional space.
- 11.29 The building's footprint has also been assessed thoroughly and is optimised to enable public realm to be delivered and to ensure a good setback from the surrounding buildings. The footprint is also driven by work on the building's overall bulk, scale and massing, and its contribution to the streetscene and townscape. It is not possible to increase the floorplates further.
- 11.30 Additional space above ground level has also been considered. AND London has advised on the commercial strategy for the development. It has been concluded that commercial space above first floor level in a mixed-use building of the nature proposed would not successfully

attract occupiers; such spaces suffer long term vacancies elsewhere and would harm the viability of the development.

- 11.31 Finally, the inclusion of additional space below ground level to maximise the commercial offer has been reviewed and is considered undeliverable. The Applicant team costed the relocation of the back of house ground floor level uses (eg: plant rooms, cycle stores) to a basement to free up ground floor space for additional commercial units. The uplift in costs to deliver a basement at each of the buildings is not considered viable, especially when considered against the value of those commercial units, which in turn would unnecessarily add significant delivery and funding risk to the project.
- 11.32 For the affordable housing building, the cost of such a basement is estimated at £2,480,676. For the shared living building (which we note also falls outside of the current adopted Local Employment Area), the cost of such a basement is estimated at £4,734,644 for the shared). This equates to a total uplift on the costing of the proposed scheme of approximately **£7.215m**, compared with an indicative capital value of **no greater than approximately £2.9m** for the hypothetical additional commercial floorspace that could be gained, based on an affordable rent of £16.80/sq. ft and an assumed 7% yield.
- 11.33 A basement would also not be pursued for the following reasons:
- 1 Basement substructure is carbon-intensive and conflicts with London Plan SI2 and the circular economy expectations and the sustainability aspirations of Haringey Council.
 - 2 Geotechnical work and adjacency to below ground utilities in this area given Thames Water and London Underground infrastructure in the area below the site allocation makes below ground work extremely complex. Consultees have raised this in relation to other recent applications in the area.
 - 3 The site is in Flood Zone 2 and an area susceptible to groundwater flooding. Basement accommodation in a groundwater-susceptible area is a genuine LLFA and EA issue.
 - 4 Basement space has no daylight, no frontage and no active edge. Should commercial space be put into the basement, rather than back of house space, commercial basement space would be less likely to let. AND's finding is that demand is for commercial space would be at ground floor level where it is lit, street-facing space.
 - 5 A basement would breach DM38(b)(iii) on environmental quality and DM38(d) on standard of amenity for users.
- 11.34 The proportional costs of basement development, both monetary and for the sustainability of the development, are significant and disproportionate to the planning benefits that could be gained.
- 11.35 The binding constraints in relation to the available space for the quantum of commercial floorspace are physical (ie: the available ground floor plane), market-driven (ie: the limited evidence for any potential letting of space above first floor level in this development) and hinge on wider deliverability points (ie: inability to deliver a basement). The proposed level of commercial floorspace is therefore considered the most viable option for the development, in this location and presented alongside the other appropriate uses for the site.

- 11.36 Ultimately, the planning policies seek for employment/commercial uses to be delivered as part of a mixed-use approach, with a mix of various town centre uses that together will ensure activity, vibrancy and security at all times of day and helps anchor the district centre, with which the proposals are compliant. The extant consent already approves a development which is residential-led, including a substantial quantum of other uses, and the employment quantum sought in the adopted site allocation is already achieved across other sites. The site is removed from an employment allocation, and the new site allocation encourages a mix of uses that complement the district centre, alongside new homes.

Community Floorspace

- 11.37 A single flexible, dual-aspect unit of 125sqm, fronting both the park and the Ashley Link, is proposed. This is secured as Use Class F2 to ensure its use for community purposes.
- 11.38 Community uses are less reliant on passing footfall compared to retail or high street uses, making this quieter edge well suited to the purpose. The space benefits from frontage onto Down Lane Park and co-location with existing provision at the Tottenham Hale Community Centre.
- 11.39 The space is designed flexibly, with a simple square layout plan form, so that it will be able to accommodate a range of community activities and lettings (both long or short term) to local community organisations. Organisations may be able to be identified through Re:shape's CIP, and engagement has been ongoing with Hope in Haringey to inform the proposals and seek out charities or community programmes that the space may help to support.
- 11.40 The Commercial Strategy, and responses to public engagement, in particular cited the lack of community facilities within the Tottenham Hale area and established a preference and recommendation for one of the ground floor units to provide community floorspace. This has been positively incorporated.
- 11.41 We note that the extant consent included a proposed nursery on the site, however it has been established through pre-application discussions that there is not a specific, identified need for such a facility at this time. It has been advised that nursery places are currently catered for and the Proposed Development would not give rise to additional need to warrant provision of a new nursery. Therefore, the ground floor unit has been proposed as F2 community floorspace to support wider community uses. The community floorspace therefore offers a positive additional benefit to the scheme.
- 11.42 The community floorspace will be operated through the shared living operator to ensure that it is consistently well managed. Re:shape's Communities Manager will work alongside the on-site management team to ensure that community building is embedded into the day-to-day operation of the development. As the lead for the CIP, the Communities Manager will act as the key link between residents, local organisations and community partners, identifying opportunities to create meaningful social impact through the Class F2 community space, and other suitable areas.
- 11.43 It is intended that the space could be let through regular and occasional use to organisations, groups and charities for various events, workshops or meetings, on a free or at-cost basis. However, should an eligible community organisation wish to occupy and

manage the community space for an agreed fixed period, this would be able to be agreed via the Communities Manager. By keeping the opportunity flexible, if a long-term occupier is not immediately identified or if there are gaps in letting to such occupiers, then the space can be used by other community groups for more ad hoc or regular lets in the meantime.

Summary

- 11.44 The delivery of non-residential floorspace complies with local and strategic planning policy seeking for mixed use development and the incorporation of town centre uses in a District Centre location, that bring key benefits to the Site in terms of its active frontage and placemaking potential, employment generation and bringing local amenities closer to residents.

12.0 **Design and Architectural Quality**

- 12.1 Local Plan Policy SP11 seeks to ensure that all new development should be of the highest standard of design that respects its local context and character. This section summarises the key design elements and highlights the architectural quality of the Proposed Development, focusing mainly on the ‘tall building’ element of the scheme.

Height, Scale, Massing

- 12.2 London Plan Policy D3 promotes the optimisation of site capacity and making the best use of land through a design-led approach. As part of this, higher density development should generally be promoted in well-connected locations, and where these locations have existing areas of high-density buildings, expansion of the areas should be positively considered. The site is in a highly accessible and sustainable location, with clear potential to accommodate high density development, as supported by the relevant planning designations, and the proposed height scale and massing have been developed in order to make optimal use of the Site.
- 12.3 In response to pre-application feedback, the taller element of the shared living block has been moved to the western end of the block, in closer proximity to Down Lane Park, in order to better respond to The Hale and Welborne developments in close proximity; to improve daylight and sunlight and overshadowing impacts; and to act as a wayfinding marker for the park and edge of the wider District Centre. The Daylight Sunlight and Overshadowing Assessment has confirmed that any impacts in terms of overshadowing of the park are acceptable. Please refer to the Daylight Sunlight and Overshadowing Assessment section of the ES for further details.
- 12.4 The tower profile is slender, with a well-defined base, middle and top. The shoulder heights of the building respond to similar typologies across the wider masterplan. The middle element of the building is stepped back slightly from the ‘bookends’ created by the tower and the wider footprint at the eastern end, to break up the overall massing of the shared living block and create improved articulation.
- 12.5 The Townscape and Visual Impact Assessment concludes that the Proposed Development would reinforce the ongoing programme of regeneration and growth associated with Tottenham Hale and would remain consistent with the wider context. The proposed height, scale and massing are therefore considered to be appropriate. The proposals would neither alter the fundamental composition, function or character of the area nor detract from the appreciation of its predominantly mixed use and residential townscape. Please refer to the TVIA for further details.
- 12.6 The Heritage Impact Assessment concludes that the Proposed Development as a whole preserve the significance of the relevant heritage assets and would not result in harm to their significance. The Site is not located within a conservation area and does not contain any designated or non-designated heritage assets within its boundary. Heritage assets are, however, present within the wider surrounding area though in the vicinity of the site there are relatively few. The Heritage Impact Assessment considers each relevant heritage asset in detail and sets out that the proposals would comply with the relevant parts of the development plan, including Policy HC1 of the London Plan and Policy DM9 of the Local

Plan. It would also comply with relevant parts of national policy and the relevant provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

- 12.7 The most notable asset is the locally listed Berol House (which itself has permission for refurbishment and vertical extension). In its current cleared and vacant condition, the Site forms part of the immediate setting of Berol House and makes a limited negative contribution to that setting by reason of its unfinished and vacant appearance. The Proposed Development will therefore contribute to the emerging context of tall, modern and high-quality development that comprises Berol House's setting. While the visual change would be significant, it will not alter the way in which the locally listed building is appreciated, nor its significance understood. Therefore, the Proposed Development would not detract from the appreciation of the Berol House, and its significance will be preserved.
- 12.8 It is acknowledged that the Proposed Development would introduce a notable change in scale relative to Nos. 1-21 Hale Road, which comprise a small group of low-rise residential properties immediately to the south. However, these properties are located within the Station Square North Site Allocation, and therefore there is a potential long-term ambition for their redevelopment as part of the allocation, and the wider area is identified for ongoing regeneration and redevelopment. The residential properties are experienced within a townscape characterised by existing, and emerging tall and large development. Whilst the Proposed Development would result in a notable change to the immediate setting of these properties, such change would be consistent with the wider direction of growth envisaged for Tottenham Hale and the long-term vision for these buildings.

Tall Buildings Statement

- 12.9 This Section provides an assessment of the proposed development against relevant tall buildings policies, given the maximum development height of 23 storeys (+85m AOD) at the taller element of the shared living block.
- 12.10 This Statement should be read in conjunction with the Design and Access Statement which contains further detail on the design development of the scheme and the rationale for the final proposed development, as well as technical assessments including the TVIA and Daylight, Sunlight and Overshadowing Assessment within the ES.

Locational Criteria

- 12.11 London Plan Policy D9 Part A states that Development Plans should define what is considered to be a tall building in relation to local context. Part B states, in relation to locations for tall buildings:

“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”

- 12.12 Adopted Local Plan Policy DM6 states that the Council expects building heights to be of an appropriate scale which responds positively to the site's surroundings, local context, and the need to achieve a high standard of design. The Site is within an area identified as being suitable for tall buildings in Policy DM6.
- 12.13 The site remains within an area 'potentially suitable for tall buildings' in the emerging Local Plan also.
- 12.14 The site's sustainable and highly accessible location, siting within a District Centre, and its local context featuring a number of tall buildings, confirms that it meets London Plan Policy D9. Nonetheless, we have provided a further assessment of Part C of the policy below for completeness.

Impact Criteria

- 12.15 Part C of the policy deals with the impacts of tall buildings, namely visual impacts, functional impacts and environmental impacts. The criteria are assessed within the table below. Please refer to the TVIA and Environmental Statement for further information.

Table 12.1 – London Plan Policy D9 Part C assessment

Policy	Part	Response
Policy D9, Part C 1. Visual Impacts Development proposals should address the following impacts.	a) the views of buildings from different distances: i. long-range views ii. mid-range views from the surrounding neighbourhood iii. immediate views from the surrounding streets	A thorough Townscape and Visual Impact Assessment has been undertaken which provides assessment of the site from a range of views, which were determined via a Zone of Theoretical Visibility, scrutinisation of the model of the scheme within Vu City and presented throughout the pre-application process. Attention has been paid to the design of the top of the taller element, to ensure this provides a positive termination to the building and positive contribution to the skyline. The building is not visible in any strategically important view corridors. The form and proportions of the building in mid-range views have been considered to ensure the building is sensibly proportioned and legible within the local townscape. Townscape has been a key consideration throughout the design development of the scheme, to ensure compliance with relevant planning policy in relation to townscape and views. Overall, the Townscape Visual Appraisal confirms that the scheme is well-designed and appropriate for its context.
	b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and	The taller element is located at the western end of the building to act as a wayfinding marker for Down Lane Park and the wider district centre and reinforces the spatial hierarchy of the wider District Centre, transitioning down from taller buildings located towards Tottenham Hale Station.

Policy	Part	Response
	aid legibility and wayfinding	
	c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan	High-quality design in terms of architecture, elevational treatment and materials has been central to the project and has evolved considerably through design development and pre-application discussions. The building materials respond to the prevailing character of the area.
	d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings.	The Heritage Impact Assessment assesses the impact of the development on heritage assets and confirms no harm to heritage assets. We note that the neighbouring locally listed building at Berol House has permission for full refurbishment and a two-storey vertical extension, it also sits in the centre of the redevelopment of the wider ARSM and therefore is already and will continue to experience significant change.
	e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it	The building will not be visible from any LVMF views and has no impact on major heritage sites in the categories listed.
	f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river	The building is not within the Thames Policy Area.
	g) buildings should not cause adverse reflected glare	Materials have been carefully selected to avoid glare.
	h) buildings should be designed to minimise light pollution from internal and external lighting	The buildings layout and design have considered internal and neighbouring amenity. The building itself will not create further adverse impacts in terms of light locally.
Policy D9, Part C 2. Functional Impact	a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must	The safety of residents has been considered within the design. Safe access and egress are incorporated in the design and has been reviewed in detail in the Fire Statement.

Policy	Part	Response
	ensure the safety of all occupants	
	b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions	A wind/ microclimate assessment has been undertaken to confirm that microclimate around the building will be satisfactory.
	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	A noise assessment has been undertaken to confirm that noise levels within and neighbouring the building will be satisfactory.
Policy D9 Part C 4. Cumulative Impact	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 retrofitting	There are other tall buildings in the area which have been considered in the design of the development and assessed in all relevant reports where cumulative scenarios are required including townscape, wind/ microclimate, daylight/ sunlight and others.
Policy D9 Part D Public Access	Free to enter publicly accessible areas should be incorporated.	There is a community and commercial floorspace at ground floor level on the Ashley Road frontage which will be usable by the public and is not restricted for use by the building residents.

12.16

Overall, the proposed height of the building is considered to be acceptable given that the Site is located in an area identified as being appropriate for tall buildings that has been undergoing significant change and has seen the emergence of numerous tall buildings in recent years as part of the active regeneration of the area. The proposed taller element is considered to reinforce the ongoing programme of regeneration and growth. The impacts of the tall building are considered to be acceptable.

Architectural Approach and Materiality

- 12.17 The proposed architecture has been carefully developed in response to the surrounding townscape, resulting in a high-quality design characterised by a considered palette of materials and a strong architectural expression, in line with Local Plan Policy DM1.
- 12.18 The design draws upon the contemporary character of the existing and emerging townscape, whilst also referencing Tottenham Hale's industrial heritage through the use of robust brick architecture, articulated bays, expressed structural elements, sawtooth roof forms, metal detailing and integrated artwork. The proposed architecture therefore celebrates the history and identity of the area.
- 12.19 The two blocks are expressed as distinct yet complementary components, reflecting their respective uses. The materiality of the Proposed Development across both buildings consists of brickwork, aluminium and a “concrete-style” material interspersed across both buildings. Brick forms the principal material across the development and is complemented by contemporary detailing and metal elements to reference the area's industrial character and tie in with the materiality of surrounding recent developments.
- 12.20 Secondary architectural features, including variations in brick tone, perforated metal panels and concrete-effect banding, introduce visual interest, articulation and depth, whilst helping to break down the perceived scale and massing of the blocks.
- 12.21 In summary, materials are applied to each building as follows:
- Shared living – Features a mixture of brickwork, Polyester Powder Coated (PPC) aluminium, a “concrete-style” material, and playful tones of green glazed terracotta. The materiality of the façade will include several different visual styles of each material listed above; however, all will have a colour palette including light to dark grey (with the exception of the green hues used for the glazed terracotta); and
 - Affordable Residential – This building will also feature brickwork however a smaller variety of visual styles will be used across each of the three materials. The brickwork elements will have a lighter tone on this building, with tones ranging from grey to off-white. Moreover, the PPC aluminium will utilise a light green tone, with white railings, making both buildings visually distinct from each other.
 - The tonality of the “concrete-style” material will remain the same across both buildings.
 - Further information on material colour and palette is included in the DAS.
- 12.22 The shared living building is particularly characterised by a strong vertical composition, with a slender tower element and is articulated through a regular façade rhythm, recessed openings and a lighter material palette.
- 12.23 In contrast, the Social Rented Block adopts a more horizontal expression, again defined by articulated bays and recessed balconies. The building is further distinguished by a sawtooth roof profile to its end pavilions, which provides a distinctive silhouette and draws reference from the industrial and warehouse forms historically associated with the area.
- 12.24 Together, the blocks achieve a cohesive architectural composition that reinforces the identity of the development whilst contributing positively to the evolving character of Tottenham Hale. Celebratory features are incorporated into the architecture (and

landscaping) across the site, through the use of colour, proposed murals, the sawtooth roof features and active frontages.

13.0 Landscaping, Urban Greening and Public Realm

- 13.1 This section summarises the development's delivery of, and compliance with planning policy and the aspirations for the Site, requirements relating to landscaping, urban greening and public realm, including provision of play space, trees and ecological enhancements.

Landscaping and UGF

- 13.2 London Plan Policy G5 states that major development proposals should incorporate high-quality landscaping. Local Plan Policy DM1 states that development proposals should integrate landscaping and planting into the development as a whole.
- 13.3 London Plan Policy G5 states that major development proposals should include urban greening as a fundamental element of site and building design, by incorporating measures such as high-quality landscaping and green roofs and requires a UGF of 0.4 for residential schemes. Local Plan Policy DM21 requires proposals to maximise opportunities to enhance biodiversity, including through appropriate landscaping, sustainable drainage systems and green walls.
- 13.4 In line with the policies, the scheme includes high-quality landscaping throughout the central route/'Green Link' at ground floor level and maximises the opportunity for landscaping at roof level in the form of the terrace garden on the shared living block, to alleviate any pressure on the ground floor public realm, and through the biodiverse green roofs. Please refer to the Landscape Strategy prepared by Studio Bosk for further details.
- 13.5 By maximising the extent of soft landscaping and biodiverse green roof area, and through the ample provision of new trees, the scheme achieves a UGF score of 0.4 as required by policy. The soft landscaping features a mix of grasses, herbaceous perennials, and evergreen shrubs and ferns delivering diverse and species rich planting beneficial to pollinators to support biodiversity. Feature log piles, boulders and cobbles are provided on the affordable block green roof for ecological value.
- 13.6 The proposed materials palette for the landscaping has also been carefully considered to ensure permeable hard surfaces are utilised where appropriate. The green roof will capture rainwater and slow down flows, as will the areas of planting and soft surfacing. An attenuation tank will be provided. These measures will capture water at its source and will aid in slowing down surface water-run off, as required by Local Plan Policy DM25. Please refer to the Drainage Strategy Report for further details.
- 13.7 Overall, high-quality landscaping that serves different functions and provides urban greening, biodiversity enhancements and manages surface water drainage is integrated throughout the scheme in line with the relevant policies. The landscape treatment, planting, street planting and surface materials are of good quality, durable and fit-for-purpose. It therefore aligns with planning policy requirements for quality landscaping to be integrated into the proposals.

Play Space

- 13.8 Paragraph 4.32 of the Shaping Neighbourhoods Play and Informal SPG presents the principle that 0-4 children's play space requirements can be reduced based on type of housing proposed and their access to private gardens. The proposed affordable block contains 10x maisonettes with front and rear gardens that exceed private space requirements. Engaging the SPG para 4.32, the requirement as per the GLA Child Yield Calculation should be for 360sqm of 0-4 play space, all of which is provided on site (361sqm total). The delivery of doorstep play on site is a positive benefit of the development.
- 13.9 The SPG paragraph does however state that to benefit from this 'reduction' in the quantum of 0-4 play space required, older children's (5+) play should also be provided on site. Given the site's proximity to Down Lane Park, it is not considered that older children's play is required to be provided on site, in the context of the need to deliver public realm, and longstanding aspirations for the green link to be of a civic, urban nature, providing a key route for pedestrians and cyclists. On this basis, additional play space on site is not feasible, as a larger quantum of play space, or the inclusion of older children's play would change the nature of the proposed landscaping and public realm within the proposals. It was discussed throughout the pre-application stage that: the proposed quantum of play space would be appropriate to provide doorstep play on site; that the provision of private gardens for the largest maisonettes would be preferred over additional play space to the rear of the affordable housing block; that older children's play could be provided via a contribution to offsite playspace at Down Lane Park, especially given the Council's aspirations to develop the landscaping and social infrastructure within the Park and the S106 contributions that have been gathered from other local developments to date towards this.

Public Realm

- 13.10 London Plan Policy D8 requires public realm to be well-designed, safe, accessible, inclusive, attractive and well-connected, and easy to understand, service and maintain. Local Plan Policy DM2 is concerned with the creation of safe and accessible environments and states that proposals should ensure that new developments can be used safely, easily and with dignity by all, including through creating new safe and accessibility pedestrian and cycling routes.
- 13.11 The public realm strategy features a hierarchy of pedestrian and cycle routes providing links to the surrounding area, including the primary east west route and a secondary north south route linking to surrounding development via the under-croft. The routes are highly visible and clearly delineated through paving type and planting/screening of other areas. For safety, vehicular access is limited.
- 13.12 The scheme incorporates public art within the under-croft space/entrance to the affordable housing block core, which helps to mark the entrance and enhances local distinctiveness and the overall legibility of the scheme, as encouraged by Local Plan Policy DM3. This contributes towards a vibrant, engaging public realm.
- 13.13 The public realm is activated by the layout of the building entrances, which are in clear prominent locations and provide natural surveillance; as well as through the inclusion of benches and other seating options at key locations; and the integration of play space and

‘play on the way’ features. The public realm scheme provides 0-4 play space on site and these features create a welcoming and engaging public realm that encourages lingering and supports social interaction.

- 13.14 The sense of safety is enhanced by the inclusion of carefully considered street lighting, which illuminates and marks key routes and spaces. The proposed lighting is integrated within the fabric of the building, hard landscaping and street furniture where possible to avoid clutter and is designed to minimise light pollution and disruption to residents.
- 13.15 Please refer to the Landscape Strategy and DAS for further details on public realm.

Trees

- 13.16 The Proposed Development delivers 76 new trees, comprising 56 at ground level, and 20 at roof level of a species that will not require reinforced structures. Trees will consist of a wide variety of native tree species as set out in the Landscaping Strategy, improving the urban greening to the site which has visual, sustainability and health benefits. The proposed tree planting responds to Local Plan Policy DM1 which seeks for planting to be integrated into the development and for native tree species to be prioritised.
- 13.17 To facilitate the delivery of the development, a tree just beyond the Site boundary, to the north of the affordable housing block must be removed. This tree is identified as T11 (Category B) in the Arboricultural Impact Assessment and Tree Constraints Plan, which provide further detail. Its retention has been explored in detail, including seeking to move or reduced the affordable housing building to accommodate it. However, due to its location so close to the site boundary and its wide root protection area, and the physical constraints of the site and need to maintain separation distances between the two proposed buildings, it has been concluded that removal is the only option.
- 13.18 We note that the proposal delivers significant benefits, not least the affordable housing, which the tree is being removed directly to enable the construction of. This is considered to outweigh the retention of the tree, in the context of new landscaping provisions across the site that will improve the site’s greening substantially. The loss of T11 will not detract from the local environment given the new, additional and improved planting that will take place on site. The principle of this has been discussed at the pre-application stage, subject to confirmation of the CAVAT valuation and formal agreement with the Tree Officer.
- 13.19 A CAVAT assessment will be undertaken during determination, to confirm the remedial payment to be made to further help offset the loss of this tree.

Ecology and Biodiversity Net Gain

- 13.20 A number of ecological enhancements will be included with the designs for the Proposed Development in an effort to improve biodiversity within the site in accordance with planning policy. The finalised landscaping strategy for the Site has included the following ecological enhancements, which have been detailed within the Ecological Appraisal and the Biodiversity Net Gain Assessment submitted alongside this planning application:
- 1 Biodiverse Roof – A principal means of delivering green infrastructure within the urban environment, green roofs will provide a range of ecosystem services. Buildings

will provide green roofs with intensive planting which includes native grasses and flowering plants to maximise biodiversity and provide habitat for several species;

- 2 Public Realm Enhancements – Semi-natural planting, extensive green roof, trees, hedges, flower rich perennial planting and rain gardens to enhance the public realm as well as improve the biodiversity of the area and enhance the Site; and
- 3 Ecological Enhancements – Bird boxes, sand and log piles, insect blocks, stag beetle loggery and bat boxes will all be incorporated into the Proposed Development, with the majority being situated on the biodiverse rooftops and away from external amenity spaces.

13.21 Given the provision of all of the above landscaping, open space and public realm, and the incorporation of trees, planting and greening in the development, the proposals also achieve +10.58% BNG, meeting legal requirements for 10% BNG on site.

14.0 **Quality and Amenity Matters**

- 14.1 This section summarises quality and amenity matters that have been considered through robust technical assessment. The results of these assessments have fed into the iterative design development process and informed the final Proposed Development, to ensure it meets relevant standards and provides a quality environment for residents and visitors to the development once built. Please refer to the respective reports and Environmental Impact Assessment for further detail.

Daylight, Sunlight and Overshadowing

Internal Condition

- 14.2 A comprehensive internal daylight assessment has been undertaken for all proposed habitable spaces. Of the 522 shared-living rooms assessed, 426 rooms (82%) will meet or exceed the BRE Daylight Illuminance target of 100-lux. This level of compliance is considered to represent a very strong performance, particularly when viewed in the context of a high-density urban development.
- 14.3 Of the 96 shared-living rooms that do not achieve the 100-lux target, 92 of these rooms achieve median lux levels of between 54 lux and 97 lux. This indicates that the vast majority of these rooms will only experience minor to moderate deviations from the targets and will still achieve appropriate levels of internal daylight.
- 14.4 Daylight and sunlight levels have also been assessed within the proposed communal spaces across the shared living building. The communal spaces achieve very high levels of daylight and sunlight overall and comfortably meet the BRE targets, providing bright and attractive spaces that will offer a high-quality environment for future residents.
- 14.5 The results of our BRE Daylight Illuminance assessments within the C3 Affordable Block have indicated that 107 (37%) of the 293 habitable rooms will meet the targets. The daylight performance within this block is influenced by a combination of factors including the low-rise nature of the Affordable Block to assist deliverability, close proximity of neighbouring development at Rosa Luxemburg Apartments, the relationship with the proposed shared-living building to the south, and the inclusion of external access decks and private balconies. The tight urban grain of the area has been established through the ARSM, and the results broadly replicate permitted scenarios in the locality, and are comparable to the extant consents, which has been reviewed in detail in the Internal Daylight Sunlight Report.
- 14.6 The internal daylight and sunlight results should be considered in the context of delivering a comprehensive mixed-use redevelopment on a constrained urban site. The scheme seeks to balance the deliverability and fundability of the Affordable Housing Block, and the resulting residential amenity with the delivery of new homes, including family houses, affordable housing, active ground-floor uses and wider placemaking objectives within a master-planned regeneration area. While these objectives can place constraints on the amenity performance achievable for some dwellings, extensive daylight and sunlight testing has informed the evolution of the design, helping to maximise residential amenity within the context of a higher-density mixed-use development.
- 14.7 Further detail is provided in the Internal Daylight Sunlight Report.

Neighbouring Impacts

- 14.8 The results of the baseline VSC assessment show that only 47% of the windows assessed achieve the BRE recommended 27% in the existing condition. Lower levels of existing daylight make windows and rooms more susceptible to change, and likely will result in larger proportional reductions with the Proposed Development in place. This existing condition is due to the dense urban form that has come through the development of the ARSM in the context of this highly sustainable, District Centre location, where high density development is to be expected and is encouraged across national, strategic and local policy.
- 14.9 We note that given the clear nature of the existing site, where windows and rooms have a clearer outlook and are not obstructed by overhanging balconies, there are instances of relatively high levels of existing daylight and sunlight. In this context, it is important to note that any meaningful development will inevitably result in a noticeable relative change in light levels. This is a temporary position, a change to which has already been anticipated given the areas regeneration and would occur if the extant or new Proposed Development were constructed.
- 14.10 The remaining properties which do see daylight and sunlight deviations have been discussed in further detail in the ES. It is considered that there would be significant effects to daylight as a result of the Proposed Development in both the Completed Development and Cumulative Scenario. With the Proposed Development in place the daylight impacts to Rosa Luxemburg Apartments, West Apartments, 165-195 High Cross Road, 3-9 Hale Road and 19-21 Hale Road are considered to be significant, presented Moderate to Major adverse impacts. Across these properties however, these impacts are driven by self-constraining features and unusually high levels of daylight and sunlight within the baseline scenario. Typical retained levels of VSC are within a range that is considered “barely noticeable” when compared to previously consented massing on Site.
- 14.11 The detailed ES assessment concludes that for the majority of buildings studied, the overall effect to daylight at the above properties with the Proposed Development in place is considered to be direct, local, long-term, permanent and Negligible (not significant).
- 14.12 The Proposed Development would not result in significant effects to daylight, sunlight or overshadowing to any of the cumulative schemes assessed as part of the future baseline assessment.
- 14.13 Further details of the daylight and sunlight impacts at neighbouring properties are set out within the Daylight Sunlight and Overshadowing section of the ES.

Overshadowing

- 14.14 The potential for overshadowing of the public realm and adjacent Park has been considered throughout the design process. Transient shadow images which detail the shadow cast by the proposal throughout the day, at three different points of the year show that the proposal casts a thin shadow across the southern element of the park throughout the morning until c.2pm. The thin shadow is limited to the sports pitches and playground and does not extend to the bulk of the park to the north. This shadow moves relatively quickly across the site, meaning that elements of the park, including the sports pitches and playground are not in shade for prolonged periods of time. The June images show that the additional shadow is

much smaller, as it is limited to the early morning, with no additional shadow being cast on the park beyond 12pm.

- 14.15 The assessment highlights the relatively minimal impact on the park during the summer months when the park will be used most. Further details of the overshadowing assessment are set out within the Daylight Sunlight and Overshadowing section of the ES.

Overheating

- 14.16 The proposed development has been assessed in accordance with the cooling hierarchy detailed in policy SI 4 of the London Plan, the latest GLA Energy Assessment Guidance 2022 and Building Regulations Part O 2021, in order to reduce overheating and minimise the use of air conditioning.
- 14.17 In residential dwellings the use of natural ventilation via openable windows/doors and increased mechanical ventilation where necessary will generally sufficiently reduce the risk of overheating.
- 14.18 In the apartments affected by higher external noise levels, where the occupants may choose to keep their bedroom windows closed at night, an alternative method of reducing the risk of overheating is proposed with the installation of a MVHR cooling module.
- 14.19 The full Overheating Assessment is included within the Energy Assessment.

Noise

- 14.20 The Proposed Development introduces residential uses. The evaluation of external ambient sound pressure levels shows that the future occupants will have access to private or shared locations where appropriate noise conditions are predicted.
- 14.21 The evaluation of indoor sound pressure levels indicates that mitigation measures will be required to comply with typical criteria. As per other residential developments, an appropriately worded planning condition would be expected to secure meeting the criteria included.
- 14.22 Overall, the proposals adhere to the relevant national and regional policy requirements regarding minimising and managing noise and vibration impacts. With the recommended mitigation and design measures in place, the development is considered acceptable.
- 14.23 Further details are provided in the Noise Impact Assessment.

Air Quality

- 14.24 The air quality impacts and effects of the Proposed Development on local air quality have been studied and considered to be not significant. A review of relevant monitoring data indicates that NO₂, PM₁₀ and PM_{2.5} concentrations would be suitable for future users of the Proposed Development. The effect of local air quality on future users of the Proposed Development would be not significant.
- 14.25 Overall, the effect of the Proposed Development during construction and when complete and operational will not be significant and will be acceptable in accordance with London Plan Policy SI1.

14.26 Further details are provided in the Air Quality Assessment.

Wind

14.27 Computational Fluid Dynamics (CFD) modelling was undertaken on the Proposed Development as it has been described throughout this ES chapter. This identified two instances of comfort exceedance; one in the ground level play space and one on the proposed terrace at Level 7 of the shared living building.

14.28 In response to this the tree planting strategy was revised to incorporate 11 more trees than the previously tested layout (69 previously, revised to 76 proposed in total). It was considered by the technical team on the basis of their professional experience that this addition would be sufficient to prevent the above comfort exceedances.

14.29 Further details relating to the Computational Fluid Dynamics Assessment and the included wind mitigation measures are set out within the ES.

Construction Stage Impacts

14.30 The submitted Environmental Statement has also considered construction-stage impacts, which have also driven environmental management and mitigations, and considerations relating to delivery, including construction logistics for example, that in turn assisted in the design development of the proposals, to ensure they can be constructed effectively and in a manner that manages and mitigates harm that may arise. Please see the Environmental Statement for the further details.

15.0 **Transport, Parking and Servicing**

- 15.1 This section summarises key elements of the proposal relating to transport matters, confirming that the proposals encourage the use of sustainable modes of transport. The access and servicing around the development is also appropriately catered for. Further details are provided in the Transport Assessment and associated documents.

Sustainable Transport

- 15.2 The NPPF (2026) encourages directing of growth to the most appropriate and sustainable locations. Policy T1 of the London Plan states that development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport. Policy T2 states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Part D states that development proposals should deliver and support the ten Healthy Streets Indicators in line with Transport for London (TfL) guidance; reduce car use; and promote walking, cycling and use of public transport.
- 15.3 Local Plan Policy DM31 states that the Council will support the protection, improvement and creation of pedestrian and cycle routes in the Borough to encourage walking and cycling both as a means of transport and as recreational activity and requires submission of a Transport Assessment.
- 15.4 The Site has a PTAL of 5 (with a small portion at 6a) and is sustainably located in the District Centre in close proximity to Tottenham Hale Station, with very good/excellent public transport accessibility. The transport strategy and design of the Proposed Development have been developed in accordance with the TfL guidance, and delivers car-free development and a landscape/public realm strategy centred around delivering the Green Link connection to promote active travel and enhance east west permeability between the District Centre/ station and the wider area.
- 15.5 A Transport Assessment including an Active Travel Zone Assessment is provided in support of the application, in line with all relevant practice guidance. The Assessment concludes that the impact of the Proposed Development would not have a severe residual impact on the local highway network, being in a location that offers good access to public transport services, and that the proposals are acceptable in traffic and transport terms.

Car Parking

- 15.6 London Plan Policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity, and that car-free development should be the starting point for development in well-connected locations.
- 15.7 Policy T6.1 sets parking standards for residential development. Part D states that residential development proposals delivering ten or more units must, as a minimum, ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset.
- 15.8 The Proposed Development will provide 10 accessible car parking spaces, available from the outset of the development.

- 15.9 Of these 10 spaces, 9 will be designated for the C3 affordable housing units, equating to 10.3% of the units having access to a blue badge parking space (in excess of the policy requirement). The remaining space will be designated for the shared living use. The residential parking standards set out in T6.1 relate to C3 use and do not relate in the same way to the shared living use.
- 15.10 The proposals therefore improve upon policy requirements for the affordable housing's wheelchair accessible space requirement, by proposing these all at day one. This has been incorporated into the proposals following pre-application feedback on the increased need for wheelchair accessible parking associated with affordable homes in this area and future proofing against anticipated required parking needs.

Cycle Parking

- 15.11 London Plan Policy T5 states that development proposals should help remove barriers to cycling, achieved through the provision of appropriate levels of cycle parking that is fit for purpose, secure and well-located. Developments should provide cycle parking in accordance with the minimum standards set out in the London Plan and London Cycling Design Standards.
- 15.12 Policy and London Cycle Design Standard compliant long stay cycle parking for the affordable housing block/C3 residential units will be provided. A total of 116 long stay cycle parking spaces are proposed for the C3 residential units within three internal cycle stores, comprising 104 two-tier parking spaces, three standard Sheffield stands (6 spaces) and 3 Sheffield stands (6 spaces) for larger accessible cycle parking spaces.
- 15.13 Long stay cycle parking for the shared living block is provided in accordance with the Support for Housebuilding LPG. The LPG standards seek for 0.6 spaces per unit for shared living developments (Band 2) but allow for flexibility in implementation. A total of 252 long stay cycle parking spaces are proposed for the shared living units, provided in three internal ground floor cycle stores, comprising 0.48 spaces per unit. This comprises 224 two-tier spaces, 7 standard Sheffield stands (14 spaces) and 6 larger accessible cycle spaces. The quantum and mix of spaces is considered appropriate to deliver excellent quality cycle parking provisions, in safe and secure stores, alongside the potential for shared cycle rental.
- 15.14 Paragraph 2.3.1 of the LPG states that the provision of space for public cycle parking can contribute towards the minimum long-term cycle parking standards. Paragraph 2.3.3 states that greater levels of hire cycle parking at shared living developments will be acceptable given their shorter tenures. The development provides two areas dedicated for Lime/shared e-bike parking, both of which can accommodate 12 cycles providing 24 spaces overall.
- 15.15 The combination of the internal long stay cycle parking and the shared e-bike spaces is therefore considered to be policy compliant. Please refer to the Transport Assessment for further details.
- 15.16 Short term cycle parking for the C3 use will also be provided in accordance with the London Plan standards, with a requirement of two spaces per 5-40 dwellings, plus 1 space per 40 dwellings thereafter. Three spaces are provided for the C3 use, and 14 short stay spaces are provided associated with the shared living use.

Servicing

- 15.17 London Plan Policy T7 states that development proposals should facilitate safe, clean and efficient deliveries and servicing.
- 15.18 Servicing and deliveries will be undertaken from the six existing loading bays on the western side of Ashley Road, this will meet the requirements of post and mail deliveries, refuse collection and maintenance vehicles. Refuse stores are located on the ground floors of the eastern end of each block to ensure that collection vehicles can access within 10m of the stores. The safety of pedestrians and cyclists has been carefully considered within the delivery and servicing strategy.
- 15.19 Please refer to the Delivery and Servicing Plan for further information. The Plan concludes that the proposals provide for suitable policy compliant deliveries and servicing arrangements that minimise impacts on the local highways network and pedestrians/cyclists.

16.0 Energy and Sustainability

16.1 Re:shape has strong sustainability ambitions and have developed a considered sustainability brief for the project in line with their ESG framework and wider responsible materials and procurement strategy.

16.2 This section summarises the scheme's policy compliance in relation to energy and sustainability matters, confirming the development embeds sustainability throughout its design, delivery and operation. Further details are provided in the Sustainability Statement, Energy Strategy, Whole Life Carbon Assessment and Circular Economy Statement.

Energy Strategy

16.3 The Proposed Development incorporates numerous measures to ensure the development is sustainable, energy efficient and reduces CO₂ emissions, to meet relevant Part L (2021) of the Building Regulations and the GLA energy hierarchy.

16.4 It has been designed to incorporate energy reduction measures into the design of the building from the earliest feasibility and design stages, to enable an efficient and sustainable energy strategy to be delivered, including:

- 1 The thermal performance of the building fabric provides improvements over the Building Regulations Part L 2021 minimum requirements;
- 2 Thermal bridging is minimised to reduce heat loss and prevent the development of cold spots;
- 3 Air permeability has been set above minimum requirements to reduce heat loss during the winter;
- 4 The heating system is designed to minimise heat loss; and
- 5 Energy efficient LED lighting will be utilised throughout, and smart controls/metering are expected to be utilised by future residents.

16.5 The energy strategy for the operational buildings provides all-electric energy for the development through a communal system implemented for each individual building. It is proposed to install a central air source heat pumps on each block that are specifically designed to operate at the expected operating temperatures to maximise efficiency.

16.6 As required by London Plan Policy SI3, the energy strategy is designed to enable future connection to a District Heat Network, should this become available. It is not possible to connect to an existing or proposed heat network at this time. The energy strategy is therefore highly sustainable, future-proofed, and policy compliant in this regard.

16.7 The energy strategy for the Proposed Development follows the London Plan's energy hierarchy approach of 'Be Lean', 'Be Clean', 'Be Green', and 'Be Seen' as detailed in policy SI2. The Energy Assessment provides details of the emissions at each stage, demonstrating that the Proposed Development achieves:

- 1 For residential elements, an overall on-site reduction of 72% in regulated carbon dioxide emissions over Part L 2021, exceeding the GLA minimum target of 35% and the benchmark target of 50% and significantly reduced energy demand, exceeding the GLA

target of 10%, achieving a reduction of 12% in regulated carbon emissions over Part L 2021 at the 'Be Lean' stage of the hierarchy, through passive design and energy efficiency measures alone.

- 2 For non-residential elements, an overall on-site reduction of 53% in regulated carbon dioxide emissions over Part L 2021, exceeding the GLA minimum target of 35%, and significantly reduced energy demand, exceeding the GLA target of 15%, achieving a reduction of 27% in regulated carbon emissions over Part L 2021 at the 'Be Lean' stage of the hierarchy, through passive design and energy efficiency measures alone.

Whole Life Carbon Conclusions

- 16.8 As per the requirements of the GLA Whole Life Carbon Assessment guidance, a Whole Life Carbon Assessment has been undertaken. This confirms that at present, the project is achieving the GLA benchmark for upfront embodied carbon and the GLA benchmark target for whole life embodied carbon.
- 16.9 Further details are provided in the Whole Life Carbon Assessment and accompanying GLA spreadsheet.

Circular Economy Commitments

- 16.10 As per the requirements of the GLA Circular Economy Statements guidance, a Circular Economy Statement is provided which outlines the key circular economy commitments that have been embedded into the schemes design, and explains how these will be implemented.
- 16.11 The key principles of approach to circular economy are as follows:
- 1 Reduce construction waste by avoiding the use of virgin material where possible;
 - 2 Developing a design and construction specification that maximises energy and resource efficiency;
 - 3 Specification of the use of recycled content where viable;
 - 4 Designing for longevity, with specification of materials which are durable and resilient.
 - 5 Designing for flexibility and future adaptability to ensure the design can meet current and future needs.
 - 6 Where possible, building layers will be accessible to allow for alterations, replacements and eventual disassembly.
- 16.12 Further details are provided in the Circular Economy Statement and accompanying GLA spreadsheet.

17.0 Section 106 Heads of Terms

17.1 The applicant is committed to delivering the Proposed Development in accordance with the obligations considered necessary to make the development acceptable in planning terms in accordance with the relevant statutory tests. Any such planning obligations will be discussed and agreed between the applicant and LBH during the determination period, with an agreed set of Heads of Terms to form part of a prospective recommendation to the Planning Committee.

17.2 The following list provides suggested draft Section 106 Heads of Terms, which will be subject further discussions and negotiation with LBH:

- 1 Delivery of 87 affordable homes at 100% social rent.
- 2 Provision of a 125sqm community floorspace unit; agreement to let to community groups at cost.
- 3 Potential opportunity for affordable commercial/retail floorspace.
- 4 Contributions to offsite play space at Down Lane Park.
- 5 Loss of the tree outside of the site boundary – to be agreed via CAVAT valuation in due course.
- 6 Transport measures, including Travel Plan, provision and management of Blue Badge spaces, Section 278 agreement if necessary.
- 7 Public realm delivery and management.
- 8 Metropolitan Police contribution towards local policing and safety.
- 9 Employment, skills and training requirements including local apprenticeships during the construction stage.
- 10 Construction – obligation to register with the Considerate Contractor Scheme during the construction phase of the development.
- 11 Environmental monitoring fee.
- 12 Community Investment Programme (CIP).

Community Infrastructure Levy

17.3 In addition to S106 obligations, both the Mayor of London and LBH have adopted CIL charging schedules.

17.4 The development will be required to pay CIL in accordance with the 2026 CIL Annual Rates Summary, subject to indexation and update.

17.5 The total CIL charges will be calculated via the CIL process in due course.

18.0 Summary and Benefits

- 18.1 This Planning Statement provides a comprehensive assessment of the Proposed Development at Ashley Park, on the former Ashley House site, to provide a mixed-use scheme accommodating 522 shared living units, 87 social-rent homes and community and commercial floorspace, knitted into the locality by excellent public realm and the creation of a new east-west route through the Site.
- 18.2 The Proposed Development has been developed in the context of relevant planning policy and guidance and in direct response to the pre-application feedback received from LBH planning officers, the GLA, Haringey's QRP, Strategic Planning Briefings and public consultation.
- 18.3 Overall, the development represents an opportunity for housing delivery of various typologies, economic growth, townscape enhancement and public realm benefits that will improve the local area. The Proposed Development will provide substantive planning benefits, as follows:
- 1 The delivery of an exemplary high-quality design, with high quality and contextually appropriate architecture and proposed materials, with sustainability considered throughout the design.
 - 2 Residential development that will make a significant contribution to meeting housing need and support a diverse and multi-generational community.
 - 3 The delivery of affordable C3 housing all of which comprises Social Rent homes, including family sized, accessible units. These units will benefit from wheelchair accessible car parking, and private amenity spaces including rear gardens.
 - 4 Provision of high-quality shared living accommodation which meets a defined local need and responds positively to the Site's location and character.
 - 5 Optimisation of an accessible brownfield site in a highly sustainable location and completion of a remaining plot within the Ashley Road South Masterplan.
 - 6 A new east-west link, facilitating connection between Down Lane Park into the Tottenham Hale District Centre that will in due course enhances permeability and connectivity to the wider area and existing community, helping to deliver one of the Council's long-held visions for the area.
 - 7 High-quality landscaping and urban greening to create attractive and functional public realm and amenity space, including the delivery of 76 new trees.
 - 8 Provision of commercial floorspace at ground floor level to create active frontages along Ashley Road. This space will create active frontages, and contribute to the activity, vibrancy and security of the public realm, offer employment opportunities, and bring local amenities closer to the Site for residents.
 - 9 Provision of new flexible community floorspace targeted towards local groups or charities, to support and meet the needs of the existing and future community and provide a space for local groups and charities to hold a variety of events.
 - 10 Anticipated creation of 180 new jobs through the construction phase and 21 new jobs during operation.

- 11 Place-making benefits including enhancement of the area's townscape, improved visual amenity, permeability across the Site and improved legibility and wayfinding.
- 12 High quality and contextually appropriate architecture and proposed materials, with sustainability considered throughout the design.
- 13 Delivery of sustainable transport objectives through encouraging cycle and walking, providing safe and secure cycle parking, and a variety of options for cycle hire bikes.
- 14 The delivery of highly sustainable buildings, achieving BREEAM Excellent commercial spaces, incorporating green energy generation through PV panels, and reducing waste through circular economy principles embedded into the design and management of the scheme.

18.4 At the heart of the NPPF is the presumption in favour of sustainable development, this means approval of development proposals that accord with the development plan without delay. The proposed scheme accords with the policy requirements set out in the adopted plan when read as a whole and an assessment is provided in this Planning Statement. Substantial weight should be afforded to the wide-ranging benefits, as summarised above, which demonstrate that the development would simultaneously achieve social, economic and environmental dimensions necessary to be considered as sustainable development. As such, we respectfully submit that planning permission be granted by the local planning authority without delay.

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