

Objection to HGY/2026/2421 (Ashley Park)

Non-compliance with planning policies, and missed opportunity to avoid repeating past planning failures

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One Page Summary

- **Ashley Park does not demonstrate compliance with at least nine adopted and national policies** (London Plan SI 3 and SI 4; Haringey Local Plan SP4, DM21 and DM22; Tottenham Area Action Plan TH5 and TH6; NPPF 2026 policies CC2 and CC3).
- **Ashley Park residents could pay up to 151% more (2.5x) for heat and 452% more (over 5x) for standing charges than under the Ofgem price cap, plus around £900 a year in service charges for plant maintenance, as Tottenham Hale neighbours on communal heating already do.**
 - Hardly affordable for the 87 social rent households in the application.
- **The Victoria line's heat, 30 metres away, has never been assessed as an energy source, and could help heat homes in Tottenham Hale and Haringey**, as Northern line heat already does at the Bunhill 2 energy centre in Islington, where council tenants receive a 10% discount on heating.
- **The applicant's own assessment shows Ashley Park's residents will suffer in overheating flats, as Tottenham Hale neighbours in new builds already do.**
 - In March 2019, Haringey's Housing Retrofit Project Manager warned that residents "will suffer" when the Council signed off Millstream Tower's overheating design. They do.
- **A fifth-generation network that heats, cools and stores heat between seasons could solve these problems.**
 - One is being built at Silvertown in east London, and they already run in the Netherlands, Canada and elsewhere.
- **Haringey's own policies expect developments like Ashley Park to extend communal systems to neighbouring developments** (DM22), and require this land to be designed for connection to a heat network (Tottenham Area Action Plan).

We ask

1. **A thorough assessment:** require a proper assessment of a shared heating and cooling network before the design is fixed, engaging with neighbours.
2. **Adoption if it is the better choice for residents' bills**, with the Council taking the matter to the Mayor of London if TfL is unwilling.
3. **That the Council do its part**, in line with its Climate Change Action Plan.
4. A ready-to-connect design while the Council develops a network as a last resort.

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Key terms

Secondary heat: heat left over from other activities, such as the Tube, sewers or industry, that would otherwise be wasted. The London Plan 2021 specifically names the London Underground as an example of a secondary heat source (London Plan 2021, Glossary, p. 519).

Fifth-generation network: the newest type of district energy network. It heats and cools buildings through a shared loop of pipes; each home or building has its own small heat pump, buildings trade heat with one another, and summer heat can be stored in the ground for winter.

Communal heating: one central heating system serving a whole building or estate, with residents buying heat from its operator.

Ofgem price cap: the limit on what energy suppliers can charge households on their own gas or electricity contracts. It does not cover heat bought from a communal system.

Standing charge: a fixed daily charge paid however much energy is used.

Heat Network Priority Area: an area identified by the Greater London Authority as suitable for shared heat networks.

Planning policies (for example SI 3, DM22): adopted rules in the London Plan and Haringey's Local Plan that Haringey Council must apply when deciding applications.

s106 agreement: a legal agreement attached to a planning permission, setting out what the developer must do or pay.

Condition, and "discharging" it: a requirement attached to a planning permission; "discharging" it means Haringey Council has accepted the developer's details as meeting it.

Overheating standard (CIBSE TM59): the industry test for whether new homes will overheat in summer.

Policy non-compliance #1: The Victoria line's excess heat has not been assessed as an energy source

The Victoria line runs under Tottenham Hale, is the hottest line on the Underground, and its heat is already being used for homes elsewhere in London.

The applicant's own Health Impact Assessment places the Victoria line's Northumberland Park Spur tunnel **about 30 metres from the site**, and its geotechnical engineers call the tunnel "a key third-party constraint" requiring early engagement with London Underground. Neighbouring buildings sit over or beside the same tunnels, and Millstream Tower's permission required its bridging structure over the tunnel to be assessed for future heat network routes.

In 2024 the Victoria line was the hottest line on the network in every month, averaging **28.2°C**, against 25.3°C for the Northern line. Its January average rose from 18.4°C in 2013 to **25.7°C** in 2024: the heat is most plentiful exactly when homes need it. Crossrail's engineers found that 50 years of Underground operation has warmed the ground around London's tunnels so much that it can no longer effectively absorb the trains' waste heat, which is why many lines stay hot all year (Nicholson et al., 2014).

This is already done in London. At Bunhill 2, **Islington Council, TfL and Ramboll recover about 780 kW¹ of heat from a Northern line ventilation shaft to supply about 500 homes**, as part of a network serving 1,350 homes, a school and two leisure centres, with a 10% discount for council tenants. In summer the system can reverse to cool the tunnels: modelling with TfL estimates peak platform temperatures up to 7.2°C lower at the adjacent stations.² Extracting heat in Tottenham Hale would do the same, benefiting every Victoria line passenger.

The Applicant Skipped Local and National Policies

Ashley Park's energy assessment quotes London Plan 2021 Policy SI 3 step (b), "use zero-emission or local secondary heat sources", and then never assesses it.

The Energy Assessment (Meinhardt, Issue P3, 7 September 2026) appraises biomass, photovoltaics, solar thermal, ground source, air source and wind. Secondary heat does not appear. This is a gap in a policy test, not a matter of

¹ A kilowatt (kW) measures the rate at which heat is delivered. At Bunhill 2, about 780 kW recovered from the shaft, upgraded by a heat pump, helps supply about 500 homes.

² Bunhill 2 is a 75°C network built around gas combined heat and power. At 2019 energy prices its heat cost more than gas, and it outperformed the gas reference only once its cooling benefit to the Underground was counted (Lagoeiro et al., 2022). A low-temperature fifth-generation network needs a much smaller temperature lift, keeps the value of cooling within the neighbourhood, and at Ashley Park would compete with the applicant's own electric heat pumps, not gas.

judgement.

National policy points the same way

NPPF 2026 policy CC2 asks development to take advantage of opportunities to draw low-carbon energy from district heat networks and to co-locate heat generators and users, "especially to take advantage of suppliers of surplus heat and energy". A tunnel full of waste heat 30 metres from a scheme of over 600 units is exactly such an opportunity, and the applicant has not considered it.

The applicant knew the relevant facts

Its Environmental Statement says the site is in a **Heat Network Priority Area** and records the GLA's expectation that developments exploit secondary heat. Its geotechnical engineers found the tunnel; its energy engineers never looked. Since it must already engage London Underground about the tunnel, adding heat recovery to that conversation costs little.

Haringey Council should know too

Its 2016 Energy Masterplan identified Tube shafts, rivers and reservoirs, and building cooling as local heat sources, and recommended thermal storage for Tottenham Hale. It also warned that air source heat pumps, which Ashley Park proposes, extract less heat in winter, when demand is highest. No application on this site has assessed any of these sources. The Masterplan's estimate of Tube heat relied on 2013 data and was never measured at Tottenham Hale; the heat has grown since, and the estimate has not been revisited (see Technical Annex D).

The assessment's reason for ruling out a heat network connection is equally thin: the operator "has been contacted" and a response is awaited, followed immediately by a conclusion that connection is not feasible. **The conclusion precedes the evidence. Appendix A.7 shows what the contact was: a single email of 4 June 2026 to a general support address (help@energetik.support), with no reply included. The executive summary nevertheless says Energetik "has been engaged regarding feasibility, timescales and alignment with the delivery programme".**

Where policy is heading

Draft London Plan Policy GHR2 (Low-cost low-carbon heat) would require all major developments to submit a Low Carbon Heat Appraisal to establish the optimum low-carbon and low-cost heating solution for their site, considering upfront, whole-life and end-user costs. The assessment we ask for (see Our ask) is exactly that kind of appraisal, applied now. The draft Plan would also remove carbon offsetting (paragraph 5.21), on which Ashley Park relies to cover its remaining carbon shortfall (around £280,000 in payments), in favour of measured performance after occupation. *See Technical Annex B for extracts.*

Policy concern #2: Residents are not protected from uneconomic heating costs, calling into question whether these homes are “affordable”

Residents of new builds in Tottenham Hale on communal heating pay **up to 151% more (2.5x) per unit of heat than a household on the Ofgem domestic price cap** (Ashley Road's 16.55p against about 6.6p in April to June 2026, allowing for gas boiler losses) **and up to 452% more (over 5x) for the standing charge** (£595 a year against £108 in July to September 2026).

The reason is simple: **communal heat is bought on commercial contracts outside the cap, and residents cannot switch supplier**. Ashley Park's central heat pumps would repeat this.

Haringey's Local Plan expects this risk to be addressed. The supporting text to **Policy DM22 (paragraphs 4.46 and 4.55) warns against imposing "uneconomic costs on occupiers" and asks for consumers to be protected on "end user pricing", particularly those at risk of fuel poverty**. Strategic Policy SP2 asks that new homes "offer quality and affordability".

Tariffs are only part of the cost: Millstream Tower residents also pay for maintaining the building's heat network and gas boilers through the service charge, around £940 a year per home in 2025/26 (see the table notes).

Since 27 January 2026, heat network operators must ensure that charges are "fair and not disproportionate" (Ofgem authorisation condition A6), and Ofgem's guidance aims that consumers "should not be unduly disadvantaged compared to other consumers on alternative heat sources". But where heat costs sit in service charges, Ofgem only expects them to be reasonable under the Landlord and Tenant Act 1985 while the Government explores separating heat charges from housing charges. Plant costs recovered through service charges therefore largely fall outside the new price protections. Ashley Park should not repeat this.

Sample of Current Heat Rates in Tottenham Hale New Builds

Millstream Tower

Period	Total a year ^{1 2} : price cap household vs Millstream	Price cap: per kWh of heat; standing charge	Unit rate vs cap	Standing charge vs cap
Oct–Dec 2026	£782 vs £1,477: +89% (1.9x)	9.11p; 30.20p/day (£110/year)	-11% (0.9x)	+35% (1.4x)
Jul–Sep 2026	£741 vs £1,477: +99% (2.0x)	8.38p; 29.52p/day (£108/year)	-3% (1.0x)	+38% (1.4x)

Period	Total a year ^{1 2} : price cap household vs Millstream	Price cap: per kWh of heat; standing charge	Unit rate vs cap	Standing charge vs cap
Apr–Jun 2026	£646 vs £1,477: +129% (2.3x)	6.60p; 29.60p/day (£108/year)	+23% (1.2x)	+38% (1.4x)
Jan–Mar 2026	£675 vs £1,477: +119% (2.2x)	6.74p; 35.63p/day (£130/year)	+21% (1.2x)	+15% (1.1x)
Oct–Dec 2025	£692 vs £1,477: +113% (2.1x)	7.13p; 34.57p/day (£126/year)	+14% (1.1x)	+18% (1.2x)
Jul–Sep 2025	£678 vs £1,477: +118% (2.2x)	7.17p; 30.18p/day (£110/year)	+13% (1.1x)	+35% (1.4x)
Apr–Jun 2025	£728 vs £1,477: +103% (2.0x)	7.90p; 32.96p/day (£120/year)	+3% (1.0x)	+24% (1.2x)
Jan–Mar 2025	£684 vs £1,477: +116% (2.2x)	7.16p; 31.99p/day (£117/year)	+14% (1.1x)	+28% (1.3x)

The tariff has not changed since at least January 2025, so every quarter from then is shown. The variable plant maintenance of £940 a year in the service charge³ for 2025/26 is included in Millstream's total.

Ashley Road (Related Argent)

Period	Total a year ^{1 2} : price cap household vs Ashley Road	Price cap: per kWh of heat; standing charge	Unit rate vs cap	Standing charge vs cap
Oct–Dec 2026	£782 vs £1,484: +90% (1.9x) <u>before</u> <u>maintenance</u>	9.11p; 30.20p/day (£110/year)	+82% (1.8x)	+440% (5.4x)
Jul–Sep 2026	£741 vs £1,484: +100% (2.0x) <u>before</u> <u>maintenance</u>	8.38p; 29.52p/day (£108/year)	+97% (2.0x)	+452% (5.5x)
Apr–Jun 2026	£646 vs £1,484: +130% (2.3x) <u>before</u> <u>maintenance</u>	6.60p; 29.60p/day (£108/year)	+151% (2.5x)	+451% (5.5x)
Jan–Mar	£675 vs £1,484:	6.74p; 35.63p/day	+146%	+357%

Period	Total a year ^{1 2} : price cap household vs Ashley Road	Price cap: per kWh of heat; standing charge	Unit rate vs cap	Standing charge vs cap
2026	+120% (2.2x) <u>before</u> <u>maintenance</u>	(£130/year)	(2.5x)	(4.6x)

16.55p per kWh of heat and £1.63 a day (£595 a year), the 2026 tariff (January 2026 to now). Earlier tariffs were not obtained, so the comparison starts in January 2026. Plant maintenance in the service charge was not obtained by residents; the applicant or the Council should obtain it (Ask 1).

Ferry Island North

Period	Total a year ^{1 2} : price cap household vs Ferry Island North	Price cap: per kWh of heat; standing charge	Unit rate vs cap	Standing charge vs cap
Oct–Dec 2026	£782 vs £1,595: +104% (2.0x) <u>before</u> <u>maintenance</u>	9.11p; 30.20p/day (£110/year)	+206% (3.1x)	-11% (0.9x)
Jul–Sep 2026	£741 vs £1,595: +115% (2.2x) <u>before</u> <u>maintenance</u>	8.38p; 29.52p/day (£108/year)	+233% (3.3x)	-9% (0.9x)
Apr–Jun 2026	£646 vs £1,595: +147% (2.5x) <u>before</u> <u>maintenance</u>	6.60p; 29.60p/day (£108/year)	+322% (4.2x)	-9% (0.9x)
Jan–Mar 2026	£675 vs £1,595: +136% (2.4x) <u>before</u> <u>maintenance</u>	6.74p; 35.63p/day (£130/year)	+314% (4.1x)	-24% (0.8x)

27.87p per kWh of heat⁴ and 27p a day (£99 a year), the 2026 tariff as reported to us. Earlier tariffs were not obtained, so the comparison starts in January 2026. Plant maintenance in the service charge was not obtained by residents; the applicant or the Council should obtain it (Ask 1).

¹ Heat used: a flat using Ofgem's "low" typical gas consumption of 6,000 kWh a year (in effect from 1 July 2026). A gas boiler at 89.5% efficiency (the standard GLA assumption) turns this into about 5,370 kWh of heat, which is

what communal meters charge for. ² Which? survey of 10,064 homeowners, June 2025: boiler cover averages £183 a year (servicing and repairs); a one-off service averages about £79. No London-only figure is available. ³ Millstream Tower heat network and boiler maintenance (Veolia) in the Newlon service charge: £114,000 forecast for 2026–27 across 128 homes (£119,759.42 actual in 2024–25, about £936 per home). Per-home figures are averages; each lease's share differs. Sensitivity (July to September 2026): against a £79 service only, Millstream's total is 137% more (2.4x); against £300 boiler cover, 75% more (1.7x). Where plant maintenance was not obtained, totals are shown before maintenance.

⁴ Ferry Island North: unit rate and standing charge reported to us by a resident in October 2026. The resident reported that charges were higher still in the first year of billing and were reduced after a dispute with the managing agent.

The gap with capped households has only narrowed recently because the cap rose; when prices fall, the cap falls automatically but communal tariffs do not.

Developer projections cannot be relied on either: Millstream's approved energy plan assumed 90% of its heat would come from a network that never arrived.

Ashley Park repeats the same structure, with only an aim to choose a Heat Trust registered operator. *The cap figures for each quarter are from Ofgem (sources in Technical Annex E).*

These costs are not new to the borough or to Newlon. In January 2017, during the approval of Millstream Tower, Newlon's energy consultant (XCO2) told the Council that communal heat charges in an existing Newlon block "for 6000kWh annual usage are £950", against a "British Gas 'Home Energy Fixed' tariff at £327 per annum", that "a billing company alone" cost "around £100", and that the arrangement was a "monopoly supply situation, which poses restrictions on the future resident's ability to procure affordable heat by changing supplier" (Newlon response to Haringey, 26 January 2017, HGY/2016/3932).

Millstream Tower shows what happens when affordability is assumed rather than secured. It was approved as affordable housing: 117 of its 128 homes are shared ownership (91% by habitable room). **The committee relied on Haringey's Housing Strategy benchmark that mortgage, rent and service charges together should not exceed 45% of net household income (report paragraph 6.3.26), and on the applicant's statement that Newlon's "effective management" would help keep cost elements "proportionate" (report paragraph 6.3.27), but the signed s106 agreement (9 August 2017, clause 4.4) secures only buyers' income limits and local priority; it says nothing about service charges or running costs. For 2025/26, Millstream Tower's service charges came to £435,520, 34% above Newlon's budget of £325,120, and communal heating cost £120,302 against a budget of £106,000.** Households pay similar shares: a typical flat's year-end bill was £4,816.77, £1,325.31 (38%) more than Newlon estimated, including £895.55 for communal heating alone (Newlon service charge year-end statement, 25 September 2026). **Ashley Park's 87 social rent homes need affordability secured in the legal agreement, not assured.**

The applicant's Energy Assessment does not fill this gap. Its section 1.11, "Cost to

Occupants", says the applicant "has considered and minimised the energy costs to the occupants" but gives no tariff, standing charge or service charge figures, and the operator "is not known at this point, but the applicant would aim to select one who is Heat Trust registered".

Residential or commercial energy rates: an affordability problem to fix now

Households with their own meters, whether on individual heat pumps or gas boilers, are protected by the price cap and can switch supplier; households supplied through a building's central plant are not. **If Ashley Park uses central heat pumps, its residents will be in the same position as their Tottenham Hale neighbours, only with commercial electricity instead of gas.**

One way to protect residents with the Ofgem price cap: heat pumps in each flat, connected to a fifth-generation district network (see Key terms and Policy non-compliance #4), running on residents' own domestic tariffs, with a heat battery to use cheaper off-peak electricity. The developer may find other solutions, but **the applicant, officers and councillors should treat the choice between residential and commercial energy rates as a design decision to be settled now, not something residents discover after they move in, as Tottenham Hale residents found out.**

The need goes beyond new buildings: the applicant's own Health Impact Assessment finds heightened health vulnerability in the local area, and a neighbourhood network could also serve existing homes, as Enfield's ground-loop retrofit of council tower blocks shows (Technical Annex D).

Policy non-compliance #3: The applicant's homes will overheat, just like new homes in Tottenham Hale already overheat

The applicant's own Energy Assessment shows none of the 101 bedrooms tested meets the CIBSE TM59 standard with windows closed at night, and only 18% to 30% pass in hotter summers even with windows open. Its answer is a ventilation "cooling module" the report says "would not 'control' space temperature", plus portable fans. **No result shows the module works, yet other application documents present it as achieving compliance** (London Plan 2021 SI 4; Haringey DM21; NPPF 2026 CC3).

In detail (Appendix A.6): with bedroom windows closed at night, as Building Regulations Part O requires where outside noise is high, flats exceed 26°C at night for 34 to 97 hours and studios for 102 to 144 hours, against a limit of 32 hours. Blinds and ceiling fans were not modelled, and the cooling module would add running costs for residents. The applicant's own early stage overheating check

(Appendix A5, Good Homes Alliance tool) scores the scheme at 19, which the tool rates "High" risk and for which it asks for design changes as well as a detailed assessment. That score counts bedroom windows as fine to open at night (4 points rather than 8), which Appendix A.6 contradicts; corrected, the score is at least 23. Community heating is itself scored as a risk factor (3 points), and every mitigation item scores zero. No design changes are shown.³

Millstream Tower: a cautionary tale about developers and the council knowing overheating risks, and ignoring them—leaving residents to suffer

When Millstream Tower's overheating condition was discharged in 2019, Haringey's Housing Retrofit Project Manager wrote that the study was not robust and that "ultimately, it is the occupants and our residents who will suffer" (HGY/2019/0376). They do. The Millstream Tower Residents' Association is working with Newlon Housing Trust to correct the building's overheating, and residents of Ashley Road (Related Argent) also suffer in summer; our associations are working together on the issue.

The pattern is affects all of Tottenham Hale, and Haringey's own officers have warned about it repeatedly.

In February 2017, on the Monument Way scheme (HGY/2016/2184), **the Council's Carbon Management team said "opening of windows to cool down is not supported" because residents should not "have to choose between pollution... and noise or face overheating"**.

In 2017, on this very site (Cannon Factory, HGY/2016/4165), **the same team warned that "the majority the bedrooms, and 1/3 of living rooms will potentially overheat" and asked for design measures "but not through the use of blinds"**; the 2018 overheating assessment then passed 198 rooms and failed 15 by relying on internal blinds and bedroom windows fully open 24 hours a day above 22°C.

Hale Wharf Phase 2's overheating condition was discharged in July 2020 on a report requiring windows "to be left 100% open in bedrooms for 24 hours" in hot spells.

At Hale Works (Newlon), the Council asked for external blinds; they were discounted, and the consultant wrote that the building was "past the point where retrofitting alternative overheating measures is feasible", with internal blinds made "legally binding in the tenant lease" and "each resident... responsible for managing these measures" (February 2020).

At the Council Depot (HGY/2022/0752), Etude advised in May 2025 that the assessment "does not account for Part O requirements", and 45 homes now need a

³ The Energy Assessment (Meinhardt, P3, 7 September 2026) is also internally inconsistent: section 10.5 refers to overheating results in Appendix "A.4" that appear in Appendix A.6; there are two appendices numbered A.7; and the carbon saving is given as both 201.4 and 211.034 kg CO₂.

cooling unit.

At The Hale (2025), the applicant's consultant accepted that "high external noise levels mean that opening windows cannot be relied upon" and that "the only effective measure would be to introduce active cooling". Each time, the problem was identified at planning and pushed to a later condition, and residents now live with the result. Ashley Park should be required to resolve overheating with closed windows before permission, not after.

Draft London Plan Policy GHR4 (Heat risk) would require major applications to justify how the design maximises passive measures and minimises the energy used for cooling, taking account of future warmer climates (GHR4 B), and to minimise waste heat rejected from buildings, including from air conditioning (GHR4 A(4)).

Overheating is a Mayor of London priority

The Mayor's Heat Ready London plan (June 2026), London's first heat plan, estimates around one million London homes may be at high risk of overheating and around 300 additional, preventable heat deaths in London each year. Its objectives include reducing inequalities by prioritising those most at risk, and retrofitting the highest-risk homes. It describes people in poorly designed homes as among those hit hardest.

Cooling and the London Plan

A network that cools homes is still active cooling, the last step in London Plan Policy SI 4's cooling hierarchy, after passive measures. But the evidence in Tottenham Hale, including Ashley Park's own modelling, is that passive measures alone are not keeping homes cool. **Where active cooling is needed, individual air conditioners add heat to the street, which SI 4 asks developments to avoid (SI 4 A; paragraph 9.4.4); a shared network recovers that heat instead.**

Policy non-compliance #4: No shared network assessed, though Haringey policy expects one

Fifth-generation district networks explained: heating, cooling and heat storage between seasons

A fifth-generation heating and cooling network runs at low temperature, linking buildings across Tottenham Hale, each connected through its own heat pump.

A flat being cooled puts heat into the network; a flat in another building needing hot water takes it out, and surplus summer heat can be stored in the ground for winter. The applicant already does this in miniature, recovering heat from its commercial cooling to heat the homes above. Such networks operate at neighbourhood scale in the Netherlands and Canada, and one is being built, and already partly occupied, at Silvertown in London (Technical Annex D).

Tottenham Hale's existing new builds could connect easily, and their energy cost and overheating issues make them the perfect candidates

⁴Tottenham Hale's neighbouring blocks are recent, and several were required to include plant rooms designed to connect to a network, so joining would not mean tearing out their systems: a heat pump in a plant room can draw heat from a shared low-temperature loop in place of gas boilers, and in summer can reverse to pass heat back into the loop rather than into the street.

In Tottenham Hale, where overheating is already a concern, a network designed around Ashley Park would be valuable well beyond its own boundary. Researchers working with Islington Council describe connecting existing heat networks to a fifth-generation loop through heat pumps (Marques et al., 2021). How a network could grow, and the three local heat resources it could draw on, are described in Technical Annex D.

Haringey Council has required buildings in Tottenham Hale to be ready for a district heat network for ten years. Ashley Park offers only to connect if a network becomes available. Haringey's policies ask for more than that.

- **Local Plan Policy SP4 2(a)** requires all developments to "assess, identify and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network".
- **Policy DM22 C** asks developments to "optimise opportunities for extending such systems beyond the site boundary to supply energy to neighbouring existing and planned future developments".
- **Policy DM22 G** requires major development within 500 metres of a network connection zone to be designed for connection. The Tottenham Area Action Plan's guidelines for this land (TH5 and TH6) require development to be "designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22". Ashley Park does not show how it meets any of these.
- **This site, 2018.** The s106 for the permission on this land (HGY/2016/4165, 2 May 2018) required energy centres ready for the network, a safeguarded pipe route to Ashley Road and £50,000 per energy centre towards connection, and recorded that Haringey Council "fully intends to develop the DEN". That permission was implemented in 2023 and remains live. The replacement scheme offers only an unsecured statement that it could connect, and to accept an obligation to connect if a network becomes available.
- **The neighbours.** Around **1,400 homes** next to the site (the Ferry Island, North Island, Ashley Road and Welbourne blocks, Millstream Tower, and Council Depot homes) were required to include plant rooms ready for a network. Haringey Council also still holds connection rights over the older blocks and Millstream

⁴ A plant room houses a building's heating equipment, such as boilers or heat pumps.

Tower (not the Depot homes), to 2028 and 2031. In 2021 Haringey Council told its Cabinet that around 2,100 Tottenham Hale homes were "poised to connect".

- **Haringey Council's own homes, 2024.** Six months before pausing its heat network, Haringey Council required its own 272 council homes at the Ashley Road Depot to be built to its heat network specification and to connect if the network proceeds.⁵
- **Each scheme asked for less.** The Student Accommodation adjoining Millstream was obliged to connect in 2023 and released in 2025.
- The same sequence has run through Tottenham Hale for nearly a decade. In 2017 this site's Cannon Factory permission (HGY/2016/4165) accepted a boiler system "initially unconnected", with weaker carbon savings "offset by the long-term benefits... connecting to a decentralised energy network", described as an "interim solution"; the legal agreement required only "best endeavours" and allowed a return to gas CHP if no network came within five years. In December 2018 the Strategic Development Partnership scheme (HGY/2018/2223) counted carbon savings from a network connection while officers acknowledged "the DEN is unlikely to be delivered prior to the completion" and a "shortfall in the connection fees... needed to make the DEN viable" (report paragraphs 6.12.6 to 6.12.8); the applicant's energy assessment confirmed that if no network arrived within 10 years it would "continue to operate the boilers in the same manner", an approach it recorded as "confirmed as acceptable by the GLA" (BuroHappold, Energy Assessment Volume 1, July 2018, page 7). In February 2017 Carbon Management found Monument Way's individual gas boilers "not policy compliant"; the requirement became a feasibility study. In May 2023 the Council's consultant noted that a scheme's non-residential units had "no ability for future connections... This is not in alignment with the Policy or the GLA feedback... But technically correct. Approved". The Council Depot was approved on the basis that "boilers would not be installed other than as a short-term temporary measure" and that it would "use no fossil fuel combustion" (report paragraphs 6.201 and 6.271); its May 2024 energy statement says "Temporary gas boilers are being installed", achieving 14.37% against Part L 2021, "less than the target", with the network's year of operation "TBC". At The Hale, a network connection "would be available in 2023 or 2024"; by 2025, "a connection to the THDEN will not be available in time". Ashley Park's offer to connect "if a network becomes available" is the same promise, and the record shows where it leads.
- Millstream Tower's own legal agreement shows how residents are left out of these arrangements. The 2022 deed of variation (HGY/2016/3932, 12 April 2022) records that the Council "fully intends to develop the DEN" but that "there is no

⁵ Haringey Council's own Energy and Sustainability Statement for the Depot homes (Etude, Rev E, March 2022, p. 48; same wording in Rev G, April 2022) states that its fallback communal air source heat pump system is "less expensive in terms of capital costs than an ambient loop system", citing a "two-stage heating system appraisal undertaken by Max Fordham and Etude". The statement does not publish that appraisal, its figures, sources or method. The claim concerns capital cost only, not whole-life cost to residents (running, maintenance and replacement costs).

programme for such connection"; if no connection notice is served within nine years, Newlon is released and pays a deferred carbon offset of £206,872 instead. The test for connecting protects the owner, who need not connect if heat would be supplied "on commercial terms that are considered excessive to the Owners acting reasonably"; there is no equivalent test for what residents pay.

- **Out of step with London.** The GLA reports that 83% of referable⁶ residential development approved in 2024 was either connected to a heat network or connection-ready. Ashley Park, also referable to the Mayor, proposes no secured connection at all.

We ask for nothing more than Haringey Council requires of itself, and already required of this site. Ashley Park is large and sits beside the tunnels, so how its energy system is designed matters for the whole area. *See Technical Annex A for the scheme-by-scheme table.*

Our ask: a thorough assessment and adoption

Each ask concerns how Ashley Park is heated and cooled, which Haringey Council can secure through conditions and the s106 agreement (NPPF DM3). None requires refusal, and none duplicates Ofgem's regulation of heat network operators.

1. Assess thoroughly. Before the energy centre design is fixed, and in any event before superstructure works⁷ begin, the applicant should assess a fifth-generation heating and cooling network, prepared with TfL and any other owner of excess heat in the area, covering at least:

- **heat from the Victoria line** (through ventilation shafts, the station, boreholes or tunnel drainage), the River Lea, seasonal storage in the ground, **and any other local source of excess heat**;
- **whole-life costs to residents** (tariffs, standing charges, and plant maintenance and replacement recovered through service charges), **based on actual current and historical figures (back to first occupancy) from all communal schemes in Tottenham Hale, including Hale Village, Hale Wharf and Ferry Island, obtained by the applicant from operators and managing agents and published with the application** compared with the proposed air source heat pumps, including heat pumps in each flat on domestic tariffs **or any other arrangement that keeps residents protected by the domestic price cap**;
- **written confirmation from Ofgem of how residents would be protected on price under the chosen arrangement**, whether through the domestic price cap or heat network regulation, along with a comparison of options;
- how the network would reduce overheating;

⁶ Large planning applications are "referable" to the Mayor of London, who reviews them and can direct the Council's decision.

⁷ Superstructure works are the parts of construction above ground level, after the foundations.

- **connection to neighbouring buildings, engaging their leaseholders, residents and freeholders** (Local Plan SP4 and DM22);
- public, community or not-for-profit ownership.

Why before the design is fixed: national policy asks that conditions requiring action before development starts be avoided unless there is a clear justification (NPPF 2026, DM6). The justification here is that the energy centre, risers⁸ and pipe routes are set early in construction; afterwards, connection becomes far costlier or impossible.

2. Work towards the network if it is the better choice for residents. If the network's total heating cost for residents (unit rate and standing charge) is no higher than a price-capped household's over the previous 24 months, and lower than current Tottenham Hale neighbours' bills, as checked by an independent assessor, the applicant should work with Haringey Council, TfL and a network operator to deliver it. If TfL is unwilling, **Haringey Council should take the matter to the Mayor of London, who oversees TfL**, rather than let the opportunity lapse.

3. Haringey Council to do its part. Nominate a network provider before its connection rights over neighbouring blocks expire (March 2028 and April 2031), use heat network zoning and available funding, press TfL and the Mayor where needed, and publish the options report on the Tottenham Hale heat network it promised for autumn 2025.

4. Only as a last resort, ready-to-connect design. If the network is shown not to be viable, Ashley Park should be built ready to connect, to at least the standard required of this land in 2018 and of Haringey Council's own Depot homes, with any connection charge capped at the avoided cost of heat pumps, and a deferred carbon payment if it never connects.

In every case, the s106 should require Heat Trust membership and a published tariff method; heat charged separately from service charges, with individual heat meters and annual reporting to residents of plant maintenance costs, in line with Ofgem's fair pricing guidance; modelled evidence that the proposed cooling module works; and publication of the assessment, Ofgem's and TfL's responses, and any ground investigation data Haringey Council holds for Down Lane Park.

For the affordable homes, the s106 should also secure what Millstream Tower's agreement only assumed: an obligation on heat tariffs and plant charges, for example a cap linked to the Ofgem price cap or annual publication of total heating costs per home against Haringey's 45% affordability benchmark.

Working with TfL. Taking heat out of the tunnels cools them, and research on Bunhill 2 co-authored with TfL staff found that the cooling benefit goes to the railway. Any arrangement should therefore put residents first, recognise that service, with TfL contributing rather than charging for its waste heat, and recover costs rather than make profits.

⁸ Risers are vertical shafts inside a building that carry pipes and cables between floors.

Technical annexes (for Council officers and the applicant)

Technical Annex A: What Haringey Council required of each scheme

Year	Scheme	What Haringey Council required	Heating today
2007–12	Hale Village (masterplan outline HGY/2006/1177, around 1,210 homes, granted October 2007; s106 2012), including Hale Works (HGY/2017/2005, around 279 homes)	Single energy centre (Veolia) for the masterplan, with biomass, gas CHP and back-up boilers secured by s106 and condition; later schemes such as Hale Works obliged to connect. Biomass designed to supply 82% of heat, but reported as not run at all in 2015 (Hale Wharf Energy Strategy, 2016)	Energy centre (Veolia); heat mix from 2017: 75% gas CHP, 10% biomass, 15% gas boilers
2016	Hale Wharf (HGY/2016/1719, up to 505 homes)	Connect to Hale Village or on-site energy centre with future connection routes; developer committed to supply network heat to Newlon's Hale Works	Not known to residents (see question 6 for the Council)
2016–22	Millstream Tower (HGY/2016/3932, 128 homes)	Required plant room to DEN spec (the 2021 discharge of the connection condition, HGY/2021/1913, approved no connection location, punch points or route); routes for other developments; connection right to 12 Apr 2031; £206,872 owed by Newlon if no DEN	Communal gas
2018	Cannon Factory and Ashley House, this same site (HGY/2016/4165, up to 265 homes; s106 of 2 May 2018; RMA HGY/2018/2353)	Site-wide heat network with energy centres ready for the DEN: punch points, plant space and a safeguarded pipe route to Ashley Road; DEN Connection Costs of £50,000 per energy centre; best	Not built

Year	Scheme	What Haringey Council required	Heating today
		endeavours to connect. Haringey Council committed to lay spurs from "the main DEN pipeline running down Ashley Road". Permission implemented in 2023 and still extant	
2019	Ferry Island, North Island, Ashley Road (Related Argent), Welbourne (HGY/2018/2223, up to 1,036 homes)	Plant rooms to Haringey's own DEN specification (s106 cl. 4.13); connection right to 27 Mar 2028; Heat Trust compliance for supply to flats	Communal gas
2023–25	Student Accommodation, 29-33 The Hale (HGY/2021/2304, 431 beds)	s106 future DEN connection (2023). In June 2025 Haringey Council agreed DEN details need not be provided; switched to rooftop heat pumps (NMA approved 24 Oct 2025)	Heat pumps, no active cooling in residential areas
Dec 2024	Council Depot, Ashley Road (HGY/2022/0752, 272 council homes)	Must be built to the Haringey DEN Technical Specification July 2021 and connect if Haringey Council progresses the DEN; connection charge based on avoided heat pump cost (Council letter in lieu of s106, cl. 10)	[Under construction; temporary gas boilers being installed (NRG Energy Statement, May 2024)]
2026	Ashley Park (HGY/2026/2421, 522 shared living studios and 87 social rented homes), same site as 2018	An offer to accept an obligation to connect if a network becomes available, with no stated terms. Only an unsecured statement of "capability" to connect; the applicant's Utilities Strategy confirms "no district or area heat network connection currently proposed"	Standalone heat pumps

The Millstream and SDP deeds allow a network provider nominated by Haringey

Council, not only Haringey Council itself, to connect those buildings. Ferry Island's system already runs at 65/35°C, a low-temperature design suited to a heat pump network fed by a secondary source. For comparison, the GLA's Energy Monitoring Report for 2024 found that 83% of referable residential development approved that year was either connected to a heat network or connection-ready.

Technical Annex B: Haringey Council's own record, and the policy context

Haringey Council's record

- **January 2016, Energy Masterplan (Parsons Brinckerhoff for Haringey Council):** identified Tube ventilation shafts, reservoirs and waterways, and building cooling as local heat sources; said reservoirs and waterways should be pursued "with most vigour", without precluding "synergies with heat rejection from cooling systems"; warned that air source heat pumps extract less heat in winter, when demand is highest; recommended "substantial thermal storage" for Tottenham Hale and placed its notional energy centre at Ashley Road North; recommended low-temperature heat emitters and Heat Trust membership; and said Tottenham Hale should be pursued more vigorously on social grounds. It listed the Victoria line only as a barrier to laying heat pipes.
- **2016:** Haringey Council told developers on this site that "all developments in Tottenham Hale are expected to connect" to an area energy centre (WSP, HGY/2016/4165).
- **May 2018:** the s106 for this site recorded that Haringey Council "fully intends to develop the DEN and will expect the Development to be connected to the DEN", and committed to lay spurs from the DEN pipeline planned down Ashley Road.
- **March 2019, Millstream Condition 19:** Housing Retrofit Project Manager's advice to the case officer (HGY/2019/0376): *"Please be advised the condition can be discharged, however it should be noted that this is not a robust external solar shading and passive ventilation study because the site relies on MVHR and does not appear to include any solar shading (apart from blinds). In any future applications, we would expect to see solar shading designed in from initial design stages. Overheating is a risk to all building that do not have an effective ventilation strategy. Ultimately, it is the occupants and our residents who will suffer."* Discharged 23 April 2019.
- **2019–2020, Hale Works (HGY/2017/2005, Condition 32):** according to the developer's February 2020 letter, Haringey Council pressed over three rounds of meetings for external blinds, justification of brise soleil and ceiling fans, and raised air conditioning.
- **December 2021:** Haringey Council told Cabinet that around 2,100 Tottenham Hale homes with planning approval were "poised to connect", and that its planning agreements commit it to investigating a network.
- **April 2022:** Millstream Tower's s106 variation records that Haringey Council "fully

intends to develop the DEN either directly or indirectly"; Newlon owes Haringey Council £206,872 (index-linked) if no network arrives.

- **December 2024:** Haringey Council bound its own 272 Depot homes to be network-ready.
- **June 2025:** Cabinet stopped Council-led delivery but kept the network alive, promising options by autumn 2025 [no report-back found]; an independent review had found the scheme still viable. Nine days later, Carbon Management agreed the Student Accommodation need not provide DEN connection details.
- **August 2026:** Haringey Council approved a Ferry Island guide telling occupiers of 484 homes their heat source is intended to become the Tottenham Hale Heat Network (HGY/2026/1694).
- **September 2026, Ashley Park Energy Assessment:** quotes London Plan 2021 SI 3 step (b) but never assesses it; Energetik "has been contacted" with a response awaited, followed by a conclusion that connection is not feasible.
- Further record, from committee reports and discharge documents: Feb 2017, Monument Way (HGY/2016/2184): Carbon Management finds individual gas boilers "not policy compliant" and rejects relying on open windows; officers allow "some flexibility". Jan 2017, Millstream Tower: Newlon's consultant compares communal heat at £950 with £327 on a domestic tariff for 6,000 kWh and calls it a "monopoly supply situation". Jul 2017, Cannon Factory (HGY/2016/4165): boilers "initially unconnected" accepted as an "interim solution". Dec 2018, Strategic Development Partnership (HGY/2018/2223): network savings counted though the network is "unlikely to be delivered prior to the completion". Feb 2020, Hale Works: external blinds discounted, retrofit "not feasible". Jul 2020, Hale Wharf Phase 2: overheating discharged on bedroom windows "100% open... for 24 hours". June 2017, Hale Village: Veolia heat mix changing to "10% biomass, 75% gas fired CHP and 15% gas fired boilers" (Veolia email of 19 June 2017, Hale Works engineering report, Appendix 3). Aug 2022, Council Depot approved, "no fossil fuel combustion". May 2023, consultant review: "not in alignment with the Policy... Approved". May 2024, Council Depot: "Temporary gas boilers are being installed". May 2025, Etude: Depot overheating "does not account for Part O". 2025, The Hale: network connection "will not be available in time".
- Further record: Aug 2017, Millstream Tower s106 (clause 4.4): affordable housing secured by income limits (below £60,000) and local priority only; no provision on service charges. Apr 2022, Millstream deed of variation: "no programme" for network connection; nine-year notice period; £206,872 deferred offset; connection test protects the owner against excessive commercial terms. Sep 2026, Newlon year-end statement for 2025/26: service charges 34% over budget; typical flat £4,816.77, 38% over estimate; heating £895.55.

The policy context

This objection is made against the adopted development plan: the **London Plan (March 2021)** and the **Haringey Local Plan** (Strategic Policies, Development Management Policies and Tottenham Area Action Plan). References to "SI" policies are to the London Plan 2021. Of particular relevance are Haringey Local Plan Policies SP4, DM21 and DM22, and the Tottenham Area Action Plan's site guidelines for TH5 and TH6, which cover this land. National policy (NPPF, August 2026) is a material consideration; its policy DM3 asks councils to consider whether conditions or obligations can make a proposal acceptable, which is the basis of our asks. Haringey's draft Local Plan (consulted on October to December 2025) carries limited weight but points the same way: its draft Policy ZC5 ranks heat from underground ventilation shafts above air source heat pumps.

- **Adopted: London Plan (March 2021).** SI 2 (minimising greenhouse gas emissions, including the energy hierarchy and carbon offsetting); SI 3 (energy infrastructure, including the heating hierarchy: (a) connect to local existing or planned heat networks; (b) use zero-emission or local secondary heat sources, with a heat pump if required); SI 4 (managing heat risk and the cooling hierarchy).
- **Adopted: Haringey Local Plan.** SP4 (low carbon Haringey): part 2(a) requires all developments to "assess, identify and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network", and part 2(c) commits Haringey Council to work with partners on wider networks in the Upper Lee Valley. SP2 (housing): new homes should "offer quality and affordability". DM21 (sustainable design): apply the cooling hierarchy "to reduce the potential for overheating and limit reliance on mechanical air conditioning systems"; supporting text 4.31 ends the hierarchy with "active cooling systems (ensuring they are lowest carbon options)". DM22 (decentralised energy): B, examine opportunities for extending site-wide communal systems; C, "optimise opportunities for extending such systems beyond the site boundary to supply energy to neighbouring existing and planned future developments"; G, major development within 500 m of a network connection zone to be designed for connection; supporting text 4.46 and 4.55 on avoiding "uneconomic costs on occupiers" and protecting consumers on "end user pricing", particularly those at risk of fuel poverty.
- **Adopted: Tottenham Area Action Plan (2017).** TH5 Station Square North and TH6 Ashley Road South (this land): "designed for connection to a DE network, and seek to prioritise/secure connection to existing or planned future DE networks, in line with Policy DM22". The plan also identifies a "decentralised energy hub for the District Centre, forming part of a wider decentralised energy network", and requires Hale Village development to "consider how the network can be extended".
- **Council strategy: Haringey Climate Change Action Plan (March 2021).** Vision: homes "warm in the winter and cool in the summers", "affordable to run",

with "thousands of homes... connected to low carbon heat networks". Objective: connect around 12,000 homes to low carbon heat sources. Objective E3: low carbon waste heat from "energy from waste, underground" should be "captured and used to heat our homes"; first phase of the Tottenham Hale network to be built by summer 2024.

- **Emerging: Haringey draft Local Plan (consultation October to December 2025).** Limited weight. Draft ZC5 Low Carbon Heat Hierarchy ranks "secondary waste heat (e.g. from underground ventilation shafts...)" second and air source heat pumps last among ambient sources, supports "district heating and cooling networks", and asks large communal energy centres to review supplying neighbouring developments. Draft CR2 B supports capturing waste heat from transport infrastructure. Draft CR3 allows active cooling "only where robustly justified". Draft site allocation THSA03 "Ashley Link" covers this land, with an indicative capacity of 150 homes and 400 m2 of town centre uses.
- **National: NPPF (August 2026; decision-making policies in effect from 17 August 2026).** CC2(1)(e): take advantage of opportunities to draw low-carbon energy from decentralised networks such as district heat networks, where available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy. CC2(2): substantial weight to the benefits of drawing energy from district heat networks, renewable and low-carbon sources. CC3(1)(d): design approaches that minimise overheating risk. DM3(1)(e): consider whether conditions or obligations can make proposals acceptable. DM6: tests for conditions, and pre-commencement conditions to be avoided unless clearly justified. DM7: planning should not duplicate separate regulatory regimes.
- **National: Future Homes Standard (MHCLG, published March 2026, in force 24 March 2027 with a 12-month transition).** New homes to use low-carbon heating, with heat pumps and heat networks as the expected routes.
- **National: heat network zoning (Energy Act 2023; government response January 2026; regulations expected 2026).** Designated zones will carry planning safeguards to protect future heat networks and, later, connection requirements for specific buildings. Haringey was not among the 28 pilot areas.
- **Mayoral: Heat Ready London (June 2026).** London's first heat plan: around one million homes at high risk of overheating; objectives include reducing inequalities by prioritising those most at risk; priorities include retrofitting the highest-risk homes; records TfL investment in station cooling and ventilation.
- **Emerging: draft London Plan (published 27 July 2026, updated 11 September 2026; consultation to 15 October 2026; examination 2027; adoption expected early 2028).** Limited weight at this stage. GHR1 (energy efficiency, with a move towards measured performance and in-use monitoring); GHR2 (low-cost low-carbon heat, requiring major developments to submit a Low Carbon Heat Appraisal considering upfront, whole-life and end-user costs); GHR4 (heat risk: passive design first, minimising cooling energy and waste heat

from air conditioning); and removal of carbon offsetting (paragraph 5.21).

- **Mayoral commitment:** the Mayor's manifesto committed to back district heating schemes that make the most of waste heat from the Tube, such as Bunhill (recorded in GLA decision ADD2293, 2018).

Technical Annex C: Questions for Haringey Council

Haringey Council holds the records needed to answer the following questions, and each bears on how this application should be decided. We ask that officers address them in the committee report.

1. How many energy centres did the approved reserved matters for this site (HGY/2018/2353) provide, and did its energy strategy change the heat approach secured in the 2018 s106? Why it matters: the 2018 permission is live, and Ashley Park should not offer less than the permission it replaces.
2. What energy conditions and network obligations apply to the southern Ashley House permission (HGY/2019/0108, allowed on appeal in April 2020)? Why it matters: it is part of this site and shows what was already required on this land.
3. Does the Council hold records of the 2019 to 2020 meetings on overheating at Hale Works? Why it matters: they would show whether the Council's own requests (such as external blinds) were set aside, which bears on how much weight to give Ashley Park's untested cooling module.
4. Has the Council prepared a local area energy plan for the borough? Why it matters: it would show whether a Tottenham Hale network is planned, which is the basis of Ashley Park's offer to connect only "if a network becomes available".
5. Is the Council Depot (HGY/2022/0752) complete, what heating is running, and has a later letter filled section 9 (Energy) of the letter in lieu of s106? Why it matters: it is the Council's own scheme next to the site; if it runs on temporary gas boilers, that tells residents how close a network really is.
6. What was built at Hale Wharf, and does Newlon's Hale Works receive heat from it as the developer committed? Why it matters: it tests whether past obligations to supply network heat to neighbouring buildings were delivered and enforced.
7. Does Hale Village's biomass plant run today, and what share of heat does it supply? Why it matters: the network was approved on biomass supplying most of its heat; if it now runs mainly on gas, it shows how low-carbon promises perform after approval.
8. What connection provisions were actually built at Millstream Tower (plant room space, valves, routes)? Why it matters: the 2021 discharge approved no connection location, punch points or route, and Millstream's connection right runs to April 2031; it decides whether neighbouring buildings could join a network that Ashley Park helps start.
9. Has Cabinet considered any report on heat networks since autumn 2025? Why it matters: the Council's current intention on a district network decides whether "connect if available" means anything.
10. What stage has the new Local Plan reached, and have draft policies ZC5, CR2

and CR3 changed? Why it matters: it sets how much weight emerging policy carries in this decision.

11. Does the site lie within 500 metres of a connection zone shown in Development Management Policies Figure 4.4? Why it matters: if so, Policy DM22 G requires the development to be designed for connection.

12. Has the 2021 Climate Change Action Plan been updated or superseded? Why it matters: our third ask relies on the Council's own commitments in that plan.

13. What did the Council's 2024 intrusive ground investigation at Down Lane Park find, what is the park's nature conservation designation, and does a groundwater source protection zone lie beneath the area? Why it matters: these decide whether ground loops or seasonal heat storage under the park are possible (Technical Annex D).

14. Was the 2013 Alma Estate lake loop study implemented or superseded, and why? Why it matters: it is the local precedent for drawing heat from water bodies (Technical Annex D).

15. Has the GLA issued its Stage 1 report on this application, and what does it say on energy and the heating hierarchy? Why it matters: the Mayor's view on London Plan SI 3 compliance carries significant weight.

16. Has the Council or the applicant approached TfL about tunnel heat? Will the Council nominate a network provider before the 2028 and 2031 deadlines? What is the status of the Tottenham Hale heat network? Why it matters: these decide whether the network in our asks can be delivered in time.

17. Has the Council updated its 2016 assessment of Tube and river heat? Why it matters: that estimate relied on 2013 data, and the Victoria line has grown much warmer since (Technical Annex D).

18. Were the 2018 connection contributions for this site (£50,000 per energy centre) paid, or are they still due? Why it matters: they were meant to fund connection, and Ashley Park should not escape what the permission it replaces secured.

19. Why was the Student Accommodation's connection obligation released in 2025? Why it matters: it adjoins Millstream Tower and this site; releasing obligations one scheme at a time undermines the network the Council says it intends.

20. Has the Council checked Tottenham Hale against the government's national heat network zoning model, and does it intend to seek zone designation? Why it matters: zoning could require new buildings such as Ashley Park to connect.

21. Does the Council intend to bid for Warm Homes or heat network funding? Why it matters: funding decides viability, which is the applicant's main reason for not connecting.

For the applicant: Will the shared living rents include energy bills? Why it matters: if heat is bundled into rent, studio residents cannot see or challenge heat costs, and the protections discussed in section 2 would not reach them.

Freedom of Information requests have also been made to TfL (heat recovery potential at Tottenham Hale, and any approach by Haringey Council or the applicant) and to TfL or Islington Council (Bunhill 2 heat supply terms, and the status of the assessment of 56 ventilation shafts). Responses are awaited.

Technical Annex D: Technical background

Victoria line temperatures

Line-wide average tunnel temperature, 2024	Victoria	Northern	Difference
January	<u>25.7°C</u>	22.4°C	+3.3°C
July	<u>30.7°C</u>	27.9°C	+2.8°C
Annual average	<u>28.2°C</u>	25.3°C	+2.9°C

Source: TfL LU average monthly temperatures 2013–2024. January average 18.4°C in 2013. These are line-wide averages; the yield at a Tottenham Hale shaft still needs measuring. TfL data reported by the Evening Standard (July 2025) show the Victoria line was the hottest line every year from 2021 to 2024 and drew the most heat complaints in 2022, 2023 and 2024. The Guardian (July 2026) reported 34°C on the Victoria line platform at Finsbury Park during the morning peak, around ten degrees above outdoor temperature [reporter's own thermometer, not official data].

TfL's waste heat programme and the 2016 estimate

TfL's Programmes and Investment Committee paper of 3 July 2018 funded a £5.19m Waste Heat Utilisation project to supply tunnel heat to third parties, including a scheme at the Forest Road shaft on the northern Victoria line, alongside a programme to introduce cooling where temperatures are rising. TfL has said it is assessing 56 other ventilation shafts for heat export. Haringey Council's 2016 Energy Masterplan estimated borough-wide Tube heat potential at around 2,500 MWh a year using 2013 GLA data; that estimate predates Bunhill 2 and the rise in Victoria line temperatures, and was never measured at Tottenham Hale.

Bunhill 2 in detail

Bunhill 2 recovers about 780 kW from the City Road ventilation shaft on the Northern line, where exhaust air is 18 to 28°C; a 1 MW heat pump raises it to 75°C for the network. Its energy centre also contains two small gas combined heat and power units and a thermal store. It supplies about 500 homes; the older Bunhill 1 gas scheme supplies about 850, making 1,350 in total. In summer a reversible fan cools the air supplied to the tunnels: modelling with TfL estimates peak platform temperatures up to 7.2°C lower at Angel and 6.3°C lower at Old Street by 2030, with the benefit mostly limited to adjacent stations (Lagoeiro et al., 2022; Marques et al., 2021).

Heat in the ground around London's tunnels

Crossrail's engineers found that 50 years of Underground operation has warmed the ground around the tunnels so much that it can no longer effectively absorb the trains' waste heat. Their design for heat-collecting tunnel linings in London Clay, never built, estimated that each 500 metres of tunnel could supply about 100 family flats (Nicholson et al., 2014). Such linings can only be built into new tunnels; for the existing Victoria line, the realistic routes are ventilation shafts, stations, boreholes near the tunnels and tunnel drainage water (Fan et al., 2026). London Clay performs below the granite and limestone of many overseas studies, so Crossrail's London Clay design is the relevant benchmark. Real schemes typically supply part of a building's or network's demand alongside other plant (Tong et al., 2022), which is why this paper treats the Tube as one source among several.

How a fifth-generation network works

A fifth-generation district heating and cooling network (5GDHC, or ambient loop) runs at roughly 15–30°C, linking buildings across a neighbourhood, each connected through its own reversible heat pump. Buildings being cooled put heat into the network; buildings needing heat or hot water take it out; surplus summer heat can be stored in the ground and recovered in winter. Conventional air conditioning instead rejects heat outdoors, adding to the urban heat island. Ashley Park's commercial cooling already recovers rejected heat to help heat the homes above, and its Sustainability Statement says plant and riser spaces allow for "potential district heating or cooling connections". [Added 23 Sep 2026] Because the loop is cool, each heat pump needs a much smaller temperature lift than in a conventional 75°C network, which improves efficiency (Fan et al., 2026). Hot water still needs around 55 to 60°C, so the gain is smaller for hot water than for space heating. Existing hotter networks cannot practically be converted, but can connect to a fifth-generation loop through heat pumps (Marques et al., 2021). The GLA has estimated London's waste heat at about 71 TWh a year, more than the city's total heat demand of 66 TWh in 2010 (reported in Marques et al., 2021).

Tottenham Hale has three resources side by side: **the Victoria line, the River Lea and Lee Valley reservoirs** (which Haringey Council's 2016 masterplan said should be pursued "with most vigour"), and **the ground**, including the Chalk aquifer roughly 37 to 45 metres below the site (according to historical borehole records) and Down Lane Park next door as a possible storage site. All need proper assessment, which is what we ask for. See *Technical Annex D for the technical background and precedents*.

The start of something bigger. Bunhill grew in phases: Bunhill 1 opened in 2012 and Bunhill 2 in 2019. Islington then designed GreenSCIES, a fifth-generation network for more than 11,000 homes and 70 large buildings, recovering heat from the Underground and data centres, with aquifer boreholes for seasonal storage (Marques et al., 2021) [current status to confirm]. Once a loop exists at Tottenham

Hale, every new building can be both a customer and a supplier: shops, gyms, supermarkets and other businesses that need cooling would feed their surplus heat into the loop instead of dumping it outdoors. The more buildings connect, the better the balance and the lower the cost per home. Designing Ashley Park to connect would keep that possibility open.

Heat storage between seasons

- The Wandsworth Riverside Heat Network for the Wandsworth Riverside Quarter has heated and cooled around 550 homes from the Chalk aquifer since 2013.
- E.ON's Citigen network in the City of London stores heat rejected by the buildings it cools in three 200-metre boreholes.

The applicant's geotechnical study records London Clay over the Lambeth Group and Thanet Sands, with the Chalk Principal Aquifer at roughly 37 to 45 metres below the site, according to historical borehole records; the site lies in a groundwater source protection zone, so storage would need Environment Agency permitting.

Down Lane Park, Council-owned and immediately beside the site, is a candidate for a borehole field; its nature conservation designation, groundwater and drainage are real constraints. There is already a planning link: Ashley Park's off-site play contribution goes to the park, and the 2018 s106 for this site secured £895,000 towards it.

The Millstream Tower Residents' Association has requested Haringey Council's 2024 intrusive ground investigation data for the park.

The River Lea and the reservoirs as heating and cooling sources

Water bodies can supply heat in winter and absorb surplus heat in summer, subject to Environment Agency permits and ecological limits. In 2013 Enfield and Haringey jointly studied drawing heat from King George V Reservoir by lake loop for the Alma Estate; the study recommended it as the preferred option on financial and environmental grounds.

Retrofit and funding

Enfield Council connected around 400 flats in eight existing council tower blocks to shared ambient-temperature ground loops (around 100 boreholes), with a heat pump in each flat, while tenants stayed at home; reported heating bills fell from about £800 to £350 a year.

The Warm Homes Plan (January 2026) commits around £15bn, including £1.1bn for heat networks, with low-income grants moving to area-based delivery through local area energy plans from 2027-28. The Boiler Upgrade Scheme's £7,500 grant continues to 2029-30. Haringey Council should assess along with existing freeholders and home owners how these schemes could be used to expand the benefits of any new network to the broader neighbourhood.

Examples at home and abroad

- **Heerlen, Netherlands (Mijnwater):** a municipally founded network that stores heat and cold in flooded former coal mines. Buildings exchange heat with one another, with roughly half of the energy coming from customers themselves, and summer cooling charges the store for winter. It serves offices, shops, schools, industry and homes, with reported CO2 savings of around 65%.
- **Edmonton, Canada (Blatchford):** a city-owned utility serving a new neighbourhood through a shared network fed by 570 boreholes 150 metres deep. Heat is shared between buildings and between seasons, every home gets cooling as part of the same system, and the utility owns and maintains the equipment in condominium buildings.
- **Richmond, Canada (Alexandra District Energy Utility):** a city-owned ground-source heating and cooling network operating since 2012, serving over 2,200 homes and commercial space, with gas back-up only at peak times. Its rates include equipment maintenance and replacement.
- **Oakville, Canada (North Oak):** an ambient-loop network linking five residential buildings built in phases, with geothermal fields added as each phase opens so buildings can share energy. It uses no gas for space heating or cooling and is designed to connect neighbouring developments as the area grows.
- **London, Silvertown (Royal Docks):** E.ON and Lendlease are building the UK's first ectogrid, a fifth-generation network in which buildings share heating and cooling through a low-temperature loop, each using its own heat pump, for about 6,500 new homes and business properties. The first residents have moved in.

Technical Annex E: Sources

- HGY/2026/2421: Energy Assessment Report (Meinhardt, P3, 7 Sep 2026, Tables 13 and 14); Phase 1 Geotechnical and Geoenvironmental Desk Study (Whitby Wood, P03, 19 Aug 2026); Environmental Statement Vol 1 Chapter 4; Health Impact Assessment (Trium, Aug 2026); Sustainability Statement (Carbon.Climate.Certified, R04, Aug 2026); Planning Statement (Lichfields, Aug 2026); Utilities Strategy (P02, 26 Aug 2026); Noise and Vibration Impact Assessment (Trium, 28 Aug 2026)
- The London Plan (Mayor of London, March 2021): Policies SI 2, SI 3, SI 4
- [National Planning Policy Framework \(MHCLG, August 2026\)](#): policies CC2, CC3, DM3, DM6, DM7; [LGA briefing on the August 2026 NPPF](#)
- Ofgem: Heat networks fair pricing and cost allocation guidance (13 January 2026), including the fair pricing principles, paragraphs 1.39 to 1.40 and 1.66, market segmentation table and Appendix 1; general authorisation conditions A6 (Fair Pricing) and A7 (Cost Allocation), in force from 27 January 2026; Heat networks regulation: consumer protection guidance (13 January 2026), paragraphs 4.34 to 4.35; Heat networks regulation: price protections draft

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- [Future Homes and Buildings Standards: Government response \(MHCLG, March 2026\)](#)
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- Haringey Local Plan: Strategic Policies (SP4), Development Management Policies (DM21, DM22), Tottenham Area Action Plan (2017)
- London Borough of Haringey Energy Masterplan, Parsons Brinckerhoff, Rev 7, January 2016
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- HGY/2016/3932: Decision Notice (Conditions 9 and 19); Deed of Variation (12 Apr 2022); Energy Plan (Waterman, Jun 2021; HGY/2021/1913); HGY/2019/0376 comments and decision
- HGY/2018/2223: s106 (27 Mar 2019), clause 4.13; Design and Access Statements Vol 3 and 5
- HGY/2021/2304: GLA Stage 2 report (31 Jul 2023); Energy Strategy Stage 3/4; officer reports HGY/2024/1824, HGY/2024/3437, HGY/2025/3345; Condition 20 addendum (27 Jun 2025)
- HGY/2022/0752: GLA Stage 1 and 2 reports (2022); Council letter in lieu of s106 (12 Dec 2024), clause 10
- HGY/2017/2005 Hale Works Condition 32; HGY/2019/2248; developer's letter, Feb 2020
- HGY/2016/1719 Hale Wharf Energy Strategy (Hilson Moran, May 2016); HGY/2016/2184 Monument Way Energy Statement (XCO2, Sep 2016); HGY/2026/1694 Officer Report and Decision (10 Aug 2026)
- TfL LU average monthly temperatures by line, 2013–2024; TfL Programmes and Investment Committee paper, 3 Jul 2018, item 12
- [Evening Standard, 14 Jul 2025; Guardian, 11 Jul 2026](#)
- [Islington Council: Bunhill heat network; Danfoss case study: Bunhill 2](#)
- [Euroheat & Power: Mijwater, Heerlen; European Commission case study: Heerlen; Construction21: Mijwater 5GDHC grid](#)

- [Blatchford Renewable Energy Utility \(City of Edmonton\)](#); [Lulu Island Energy Company](#); [Alexandra District Energy Utility](#); [Creative Energy: North Oak](#)
- [SSE: Wandsworth Riverside](#); [Imperial College review of UK ATES](#); [Ramboll: Citigen](#)
- [Enfield North East Enfield Area Action Plan, chapter 9 \(Alma Estate lake loop study\)](#); [LGA: Enfield Council housing heat pumps](#); [Kensa: Enfield case study](#)
- [Inside Housing: Warm Homes Plan](#); [Energy Saving Trust: Warm Homes Plan](#)
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- [London Assembly question: TfL network to deliver and remove heat](#)
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- [Royal Docks: first UK home for the ectogrid low carbon energy network \(Silvertown\)](#); [E.ON: Silvertown welcomes first residents](#)
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- HGY/2026/2421 Planning Statement (Lichfields, August 2026), Affordable Housing Statement, para 10.4; Energy Assessment (Meinhardt, P3), heating system description and offer to accept a connection obligation.
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- HGY/2016/4165 (Cannon Factory): Planning Sub-Committee report, 2017, paragraph 6.12.11 and Carbon Management comments; Overheating Assessment Rev 02, July 2018.

- HGY/2018/2223 (Strategic Development Partnership): Planning Sub-Committee report, December 2018, paragraphs 6.12.6 to 6.12.12.
- HGY/2018/2223 (Strategic Development Partnership): Energy Assessment Volume 1 (BuroHappold, 23 July 2018), page 7 and section 1.5.
- HGY/2016/2184 (Monument Way): Planning Sub-Committee report, February 2017, Carbon Management comments and paragraph 6.13.6.
- Hale Wharf Phase 2: Overheating report, 3 August 2018; Haringey discharge email (R. McNaugher), 1 July 2020.
- Hale Works: overheating response L200212, 12 February 2020; Engineering Services Stage 2 Design Report (Veolia heat mix).
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