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Planning Department

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To Philip

Ashley Park (application ref. HGY/2026/2421) – Consultee and Third Part Response Summary

Following the closing of the statutory determination period for the application for the proposed mixed-use development at Ashley Park (ref. HGY/2026/2421), this letter provides a response to all consultee and third party comments received via the Council's planning application portal and/or forwarded by the case officer, up to Wednesday 4th November. All responses have been considered in detail by the Applicant and its design team.

Positively, the majority of consultees that have responded have confirmed no objection and/or no actions required in relation to the proposal. Some consultees (including UKPN, Cadent Gas, Thames Water Utilities, Historic England GLAAS, Met Police) have confirmed they are content with the development, provided appropriate conditions and obligations are secured. LBH Carbon Management Officers and Energetik Community Heat Network has requested additional information be provided to address their comments. The consultee responses received to date are summarised and responded to in Appendix 1 to this letter.

The GLA has provided its Stage 1 report (dated 2 November 2026). The report is, overall, very positive in respect of a number of policy and topic areas, and the GLA concludes that the application *"generally complies with the London Plan"*. There are information requests in relation to urban design, transport, sustainable infrastructure and environmental issues which are summarised and responded to in Appendix 2 to this letter.

There have also been 37 responses by other third parties, including members of the public or local stakeholders. Fifteen of these comprise responses providing support for the proposals and the wide-ranging benefits delivered including new homes, widening housing choices, employment provision, public realm, and new amenities locally. Twenty three letters raise objections to the proposals. The key themes cited in these objections relate to impacts on local infrastructure, traffic congestion, amenity and microclimate impacts, and queries relating to the development's energy strategy. Third party responses received to date are summarised and responded to in Appendix 3 to this letter. We note that

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the project consultation website (https://ashleyroadconsultation.co.uk/) has continues to remain live throughout the application's determination, with details of how interested parties can continue to engage with the applicant and its engagement team.

We trust the responses contained in the appendices to this letter provide the necessary information to address comments and queries raised during the statutory consultation period to enable prompt and positive determination of the application.

In conclusion, we wish to take the opportunity to summarise the planning benefits of the proposals, which weigh in support of the scheme:

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 though 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.

Should Officers require any further information on the responses contained in this letter and its appendices, please do not hesitate to contact Lichfields.

Yours sincerely



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Appendix 1: Consultee Responses

Consultee	Comments (summary)	Applicant Team Response
LBH Flood and Water Management Lead	No observation to make on the above planning application. Satisfied that sufficient information provided and the Flood Risk Assessment and Drainage Strategy report adequately addresses impacts of surface water drainage.	No response required.
LBH Education and LBH School Place Planning	The proposed development is in Haringey's primary planning area 4. Our latest School Place planning report projects a surplus of primary school places at Reception (entry) of between 3 to 5 forms of entry between now and 2032/33 (90-120 places). For secondary place planning which is planned on a borough wide basis the 2026 School Place planning report suggests a growing surplus of secondary places between 2027 and 2032. As such, it is not felt that this development will lead to a shortage of local school places	No response required.
LBH Environmental Health – Pollution Air Quality Contaminated Land	Standard conditions requested in respect of: site investigations for land contamination, the discovery unexpected contamination, registration and compliance of NRMM, management and control of dust, registration with the Considerate Contractors Scheme.	Standard conditions will be incorporated into the final conditions list. No response required.
Designing Out Crime Officer	No in principle objections to the site. Recommended suitably worded conditions and an informative. The project has the potential to achieve a Secured by Design Accreditation in due course if advice given is adhered to.	Standard conditions will be incorporated into the final conditions list. No response required.
National Grid Asset Protection Team	Confirms no National Grid Electricity Transmission assets affected by the proposal.	No response required.
Network Rail (East of Borough)	No objection. Consult with Greater Anglia in due course as required.	No response required.

London Underground Infrastructure Protection	No comments.	No response required.
LB Waltham Forest Planning Department	No comments.	No response required.
Sports England - London Region	The proposed development does not fall within the statutory remit that requires a detailed response.	No response required.
Historic England	No comments.	No response required.
Historic England GLAAS	Archaeology condition required given the site's location in an APA.	Standard conditions will be incorporated into the final conditions list. No response required
Building Safety Regulator - Planning Gateway One	Content with fire safety design, to the extent it affects land use planning considerations.	No response required.
Environment Agency	No objection.	No response required.
NHS West and North London Integrated Care Board	Sufficient existing primary healthcare capacity locally to address demand generated by the development. Mitigation not required in the form of a financial contribution at this time.	No response required.
UKPN	Applicant would be responsible for all costs associated with proposed works to substations or mitigation measures required. General advice provided on noise and distance from transformers.	Standard advice acknowledged. No response required.
Cadent Gas	No objection. Standard informative requested.	No response required.
Natural England	Unnecessary to proceed to the appropriate assessment stage.	No response required.
Thames Water Utilities	No objection with regard to foul water capacity. In summary, requests conditions and informative as follows: 1. Condition for a piling method statement. 2. Build over agreement secured. 3. Groundwater discharge and discharge consents and permits secured.	1. A piling method statement is standard. Standard conditions will be incorporated into the final conditions list. No response required 2. Through engagement with Thames Water, the structure has been designed so that a 3m easement zone is maintained between the outer face of their sewer and the building's structural foundations.

	In respect of water capacity, requests a condition and an informative to confirm the network can accommodate the additional capacity in due course.	3. Confirmed no objection to the foul or surface water drainage rates and connection points. Pre-planning enquiry was submitted with Thames Water also to confirm. The water capacity condition and informative are standard. No response required.
Met Police	Where additional development is proposed, Met Police Service seek financial contributions to support additional staffing and infrastructure there is required to deliver policing in the locality at a consistent level with the current policing.	Financial requests acknowledged, to be agreed as part of full list of HOTs.
Energetik	The DEN is anticipated to be live 2030-2031. The application's energy strategy should include: 1. Identification of suitable connection points for future district heat network infrastructure, aligned with the site's energy strategy and development phasing. 2. Safeguarding of an appropriate route for future district heating pipework between the site boundary and relevant energy plant areas. 3. Provision of sufficient space, access and layout within plant areas to accommodate the equipment required for future connection. 4. A building heating and controls strategy that does not inhibit or unnecessarily constrain future operation from a heat network. 5. Evidence of meaningful engagement with relevant heat network operators, including Energetik where appropriate, regarding connection opportunities, programme alignment and technical requirements.	The Applicant team held a meeting with Energetik on 27 October and has exchanged emails (correspondence provided separately) to discuss the timelines for the DEN (point 5). It is anticipated that the DEN will be online in time for this development. The Applicant Team is gaining a quote from Energetik (expected to be provided in November) so that the connection can be agreed in advance. A dialogue remains open. Should the DEN come forward as planned, the energy strategy will be amended and agreed with the Council at the relevant time. We are content to agree to relevant conditions/ obligations to require this, with a relevant trigger during construction. This is a standard approach where a DEN is anticipated but not currently in place. In the meantime, the development must ensure that it has a functional and compliant energy strategy in the absence of an existing DEN, to minimise risks should the DEN programme experience

		programme or funding delays outside the Applicant's control. However, the development is future-proofed for connection to the DEN. The energy strategy and proposed development plans ensure that the building can be connected to the DEN once it comes forward. Meinhardt have confirmed, as shown in the planning submission drawings, that: we have allowed future space for district heating connection and equipment, with sufficient space, access and layout allowed for within plant areas, as well as allowing for future connections to the hydraulic system. There is sufficient space to run the future district heating pipework onto the site and into the allocated plantrooms. The district heating and the building heating system are hydraulically separated and controls are dedicated to the building load and requirements – it has no direct control connection to the district heating provider. The DEN connection is planned for in advance. The site requires a connection point at each building, rather than proposing a combined energy centre, to ensure the deliverability of each phase of development is self-reliant and for ease of management and operation in due course, given the future buildings will be operated entirely independently of one another.
LBH Carbon Management	See full comments.	A separate response was provided in respect of energy and sustainability on 5 November 2026.
LBH Transport	See full comments.	A separate response will imminently be provided in respect of transport matters.

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Appendix 2: GLA Stage 1 Report

GLA comment that requires response	Applicant Team Response
Further explanation as to shared living cycle parking quantum and clarification on provision of shared bikes in line with the LSPBSL LPG caveats as appropriate.	Details for the cycle parking for Shared Living is set out in Section 6 of the submitted Transport Assessment. For the shared living cycle parking provision, the recently published London Plan Guidance Support for House Building (2026) standards which for Band 2 set shared living uses at 0.6 cycle spaces per unit. However, due to the site being located in a PTAL 5 area, which is highly accessible by rail, underground and bus services, it is considered suitable to provide less long-stay cycle parking spaces per unit as set out in Table 3.2 of the London Plan Guidance Large Scale Purpose-Built Shared Living (2024) states that 'flexibility may be applied based on the site location, and where onsite shared bicycle schemes are provided as part of the development for residents' use without charge.' This approach has been accepted by Royal Borough of Greenwich for the planning approved Re:shape development at the Electric Works site in Woolwich. In the experience of the Applicant, their existing sites show demand for cycle parking is relatively low and it is unlikely that even the proposed provision would be fully utilised. Therefore, a total of 252 (0.5 spaces per unit) long stay cycle parking spaces are proposed for the shared living units, comprising a total of 80% of the required 313 (0.6 spaces per unit) long stay cycle parking spaces. The proposed cycle parking spaces are provided in three cycle stores integrated into the ground floor of the shared living building. The cycle parking includes for 224 two tier parking spaces, 7 standard Sheffield stands (14 cycle spaces) and 7 Sheffield stands (14 cycle spaces) for larger accessible cycle parking spaces. This meets the minimum requirements of the LCDS where only 5% of parking is required for larger accessible cycles. The addition of a further 7 additional standard size Sheffield stands therefore ensures that the minimum requirements of the LCDS are exceeded. The cycle parking type mix of 90% two tier with 5% standard Sheffield stands and 5% larger cycle bays was recommended by TfL and approved by LB Haringey for the shared living scheme at 25-27 Clarendon Road (HGY/2024/2279). To supplement the above on-site parking two areas have also been defined for Lime Cycles that have been integrated into the

	areas of public realm between both buildings. Both lime cycle areas can accommodate a maximum of 12 lime cycles therefore providing overall 24 cycles overall. Initial discussions with Lime have been undertaken, wherein Lime has expressed willingness to provide adequate amounts of micromobility cycle hire, whether that would be on-site or on the public highway. Lime will assess the cycle hire patronage of the development once occupied; if more cycles are deemed necessary, Lime will provide the adequate amount to accommodate demand for the development and the surrounding area. Further discussions with Lime were also undertaken regarding the cycle micromobility movements through Down Lane Park. They confirmed that it would be possible to limit speeds through the park and the new public realm area to create a safer environment for both pedestrian and cyclists. Lime are able to govern speeds remotely for each cycle when it enters certain areas as programmed using GPS. This would be implemented if LBH deems necessary. It is noted that this is an approach that has been commonly used in other areas of London. Section 2.3 of the Support for Housebuilding LPG (March 2026) sets out that other types of cycle parking including public cycle hire cycles or scooters can count towards the overall minimum long stay cycle parking provision for the development. Therefore, the combination of lime cycle parking (12 spaces) and on-site long stay shared living cycle parking (252 spaces) meets the latest London Plan guidance and provides an overall quantum of 264 spaces which equates to a ratio of 0.51 spaces per unit. Overall, based on similar existing shred living schemes, this proposed quantum of cycle parking would be more than sufficient to mee cycle parking demand.
Consideration of inclusion affordable workspace.	An at-cost Community space was provided in lieu of affordable co-working space within the proposal. This was sought in public consultation exercises during the design development of the scheme and offers a key public benefit within the development. The community space will be managed by Re:shape, (through their residential brand, Makoto), or through the local identified Community Investment Programme (CIP) partners, and use of the Community space as ancillary free workspace for local groups, SMEs and the public can be catered for as part of the community offer. This is to be agreed in the s106. The co-working space in the shared living building itself is free to access for CIP partners on a programmed basis. Re:shape is

	implementing this commitment as part of the CIP across other schemes. The commercial units, activating the corners of the development with Ashley Road, are also offered as affordable retail units.
Clarification of the arrangements for the community space in the S106, to be agreed with the Council.	The detail of the arrangements for the community space will be captured in the S106. To clarify, this is intended to be able to be rented at-cost (ie: cleaning, management, utilities only covered), agreed open-book, and let out primarily to CIP partners. It would be open whenever partners require the space (subject to reasonable opening and closing hours etc.). The applicant has agreed to provide a community space management plan to secure additional details as necessary.
Clarification as to where the scheme meets the park and whether there is a physical boundary separating the scheme from the park.	The proposals deliver on the long-held ambitions of the Council for a public realm strategy, connecting the site into the park through the green link. The green link is provided up to the park's edge as anticipated in earlier iterations of the proposed development on this site and the wider masterplan. The buildings respond to their location activating the park edge, for example the community floorspace is located at ground floor level, directly on to the park. The works to the park itself would be under the control of LBH.
Clarification on whether there is access to a roof terrace on the AH building.	Roof level amenity space is not provided on the affordable housing block due to management issues. This was discussed and agreed with the LBH Housing team during the pre-application stage.
Confirmation that LBH is content with the location of the ground floor play space in the green link, which is near accessible parking and a servicing turning head.	The nature, layout, access and landscaping within the green link was discussed at length throughout the pre-application stage, with Officers and the QRP. Several iterations of the green link were reviewed, including and excluding space and vehicular access. The final approach takes a 'shared surface' approach, providing space for blue badge parking and an appropriately sized turning head for servicing only, and 0-4 years on-site doorstop play in the closet location to the park. The space is intended to be a calm, low-traffic environment. The use of bollards to protect the play and demarcate the end of the possible servicing area were required by transport officers and have been incorporated. This is further assisted by the use of hedge and ornamental planting to create a buffer between play users and wider green link users. A differentiation of paving types is proposed to help further separate vehicular and cyclist movements away from the play areas, with clear paved banding demarcating pedestrian only areas; we note that the 'pavement' is not slimmed, as pedestrians are able to utilise the entire space.

	Signage would also assist to gently slow any moving traffic, which could be conditioned. Design offers confirmed they are content with the approach proposed and that the proposals align with their long-held ambitions for the green link through this site and into the park, a continuation of longer link spanning either side of the Ashley Road South Masterplan.
Agreement of a financial contribution to mitigate the loss of a single tree.	The Application will offset the loss of the single tree with the replanting of 76 trees. Notwithstanding this, the Applicant is also open to providing a financial contribution to the council, which will be agreed as part of S106 discussions.
Review of the bedroom in the 2B4P flats immediately adjacent to the access to the communal deck, with a bedroom window facing the communal deck, and which may experience disturbance from people entering from the nearby core.	The Applicant team has reviewed and reconfigured the layout of the 2B4P flats with this layout, where the disturbance matter has been raised. The internal layout of the home to the north of the deck access has been altered. The window immediately next to the communal corridor has been removed to avoid any potential disturbance. The second bedroom is now relocated with a window introduced to the northern gable. This window is carefully located and staggered to avoid any direct overlooking into the windows along the southern gable of the Rosa Luxemburg. There were four windows on each floor proposed on this element of the northern elevation within the extant consent, which is now reduced to one therefore improving the direct relationship with the Rosa Luxemburg apartments where possible. The proposed building line matches the set back of the building opposite from the site boundary and is the same separation distance as approved under the extant consent. The proposed building continues to be of the typology envisaged for the masterplan area. Following EB7's review of the proposed amendments, it is confirmed that the conclusions of the Internal Daylight and Sunlight Report dated August 2026 remain unchanged. The only material amendment relevant to the assessment is the relocation of single bedroom windows across the 2nd to 5th floor levels within the affordable housing block from beneath the access deck to the north-facing elevation. Whilst the outlook from these rooms would change, the windows would continue to face the adjacent Rosa Luxemburg Apartments at close proximity, and the rooms would remain subject to similarly constrained daylight conditions. As such, the amendments would not result in a material change to internal daylight performance, and the findings and conclusions of the August 2026 assessment remain valid.

	An updated set of planning drawings, accompanied by statements from the Applicant team confirming the conformity of the amendments with the submitted technical assessments are provided under separate cover.
Request for the LPA to agree and secure material palette as the shared living via conditions. Note that the palette is relatively monochromatic palette with various shades of grey.	The proposed materiality has been derived from a detailed review of the site and its context, as presented in the DAS. Two tones of grey brick are utilised with the shared living block; a light grey and dark grey that create subtle contrast and add depth and richness to the elevations. The design went through a series of pre-application meetings and Quality Review Panel sessions prior to submission. The final materials will be secured by condition, as standard.
Energy and circular economy *(Note: there were no clarifications or updates required in the Whole Life Carbon memo therefore this is not included below)*	
Energy/carbon management comments captured in associated spreadsheet memo.	Updated spreadsheet memo to be provided separately.
Circular Economy comments captured in associated spreadsheet memo.	Updated spreadsheet memo to be provided separately.
Water	
Flood Risk Management (SI.12), Point 2 – Confirm finished flood levels, which should be higher than estimates 100-year pluvial flood level and avoid displacement of surface water	Finished floor levels will be confirmed at the next design stage, and can be reported to the Council via discharge of condition if necessary. However, permeable paving and channel drains have been proposed to mitigate the risk of water ingress to the buildings and to avoid any displacement of surface water off site, with these measures capturing rainwater at source.
Sustainable Drainage (SI.13), Point 5 – Incorporate rainwater harvesting alongside a range of SuDS.	Passive irrigation is provided through the blue/green roofs. Measures such as rainwater butts will be explored at the next design stage to provide further rainwater reuse on site. The submitted Flood Risk Assessment and Drainage Strategy Report provides the optimal solution for the site at this time. including the SuDS maintenance plan (Section 5), exceedance flow routes (Appendix E) and drainage proforma (Appendix F).
Air quality	
Air quality comments captured in associated spreadsheet memo.	Updated spreadsheet memo submitted separately alongside this letter.

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Appendix 3: Third Party Responses

Topic area/ Summary of comments raised	Applicant Team response
Impact on local infrastructure	The proposed development is in a location that has been identified by the Council and the GLA for significant regeneration and strategic scale growth, to be supported by necessary infrastructure. The proposed development will come forward as part of the wider transformation of the area, which has been planned for some time. Strain on local services has not been evidenced in the consultee response received so far in relation to a number of types of local infrastructure and capacity for provision – for example, the consultation response received from LBH Education confirms that it is not felt that the development will lead to a shortage of local school places and the NHS West and North London Integrated Care Board response confirms that there is sufficient existing primary healthcare capacity to address demand generated by the development. While Thames Water identifies the potential need to expanded capacity, this is not unusual and it has suggested is addressed through pre-occupation conditions and obligations, as standard. Contributions towards the provision and improvement of local infrastructure will be secured through S106 and CIL payments should planning permission be granted.
Potential for additional traffic and highways issues	The site lies within a highly accessible and sustainably-located regeneration area, within which the delivery of new homes and mixed-use development has been anticipated and encouraged to be delivered in. this highly accessible and sustainable location. The planning application is accompanied by a Healthy Streets Transport Assessment which concludes that the impact of the proposed development would not have a severe residual impact on the local highways network. Compared to the extant consent, the development is expected to result in a redistribution of travel demand towards public transport, while maintaining a very low level of car use. The proposed development provides ample easily accessible and secure long- and short-term cycle parking to encourage cycling and active travel. Further information is provided in the Healthy Streets Transport Assessment. All delivery and servicing activities will take place on site via a safe means of access. A detailed Servicing Plan will be conditioned and assessed by the Council, subject to the grant of planning permission. An appropriate quantum of accessible car parking spaces is provided within the development, and the development is

	otherwise car-free and expected to attract limited amounts of additional traffic.
Daylight/ Sunlight impacts on light received in neighbouring buildings	The proposed development has been carefully designed in consideration of daylight/sunlight levels in neighbouring properties and has sought to minimise impacts where possible. 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 and present Moderate to Major adverse impacts. Across these properties however, these impacts are driven by self-constraining features and the urban nature of the site, within a regeneration area and a highly accessible location. Significance is an EIA classification while acceptability is a planning judgement. BRE is advisory and applied flexibly in dense urban areas, and against the extant consent the retained levels are comparable. As the site is cleared, it is also noted that the building experience unusually high levels of daylight and sunlight within the current existing baseline scenario, where windows and rooms have a clearer outlook and are not obstructed by overhanging balconies. In this context, it is important to note that any meaningful development will inevitably result in a noticeable relative change. Overall, the impacts are considered to be acceptable in the context of a dense urban environment. Further information relating to light received in neighbouring buildings is provided in the Daylight/Sunlight Assessment, prepared by EB7, which forms part of the Environmental Statement, and is being reviewed during determination by Ramboll as part of the EIA review. The Appendices include window-by-window results.
Daylight/sunlight impacts on the Rosa Luxemburg courtyard and affordable block private gardens	Given the configuration and orientation of the proposed affordable building which must front the northern side of the Ashley Link, overshadowing will be experienced within the courtyard and the proposed affordable units' gardens. This was the case with the extant planning permission at the site which sets a benchmark in this respect. Given the southern orientation of the Rosa Luxemburg courtyard space, any reasonable development on this site was likely to incur similar impacts. To demonstrate this, the consented massing has been modelled and the assessment run to demonstrate that previously consented massing would have a similar impact within the neighbouring Daylight and Sunlight Assessment, prepared by EB7, which forms part of the Environmental Statement. The configuration of the proposed affordable block and its relationship with the Rosa Luxemburg building is the product of

	discussions with Officer, the Council's Housing Team and QRP. To help mitigate against this effect at the private gardens, the proposed units' gardens are oversized and they will remain an asset to these family homes.
Height, scale and character in relation to the surrounding context and an increase to maximum height from the consented scheme and the Ashley Road masterplan	The proposed height and scale of the development is considered to be contextually appropriate and is designed to make optimal use of the site, as required by planning policy. This form of higher density development is considered to be acceptable given the highly accessible location, within an identified regeneration area. The lower elements of the scheme broadly follow the principles of the extant consent; the additional height responds to the changing context since the extant consent was conceived. It is noted that the Ashley Road South Masterplan technically has no formal planning status though sets out the aspirations for the area, it is relatively dated having been conceived around 10 years ago and therefore does not appreciate the market conditions and transformational change in local context beyond the masterplan area. Similarly the AAP (2017), and the District Centre Framework (2014/15) are dated and development activity in Tottenham in the last decade frequently departs from these documents. The latter document does not form part of the statutory development plan and given its age caries limited material weight. Notwithstanding this, the development has sought to align with these documents where appropriate, but equally it must respond to prevailing market circumstances, subdued patterns of housing delivery and current extant planning policy which promotes optimisation and an uplift in scale and quantum. The development's layout, height and scale is a product of extensive pre-application engagement with Officers, the GLA and 3x QRP presentations. A design-led approach to optimisation has been adopted in accordance with up to date development plan policy. The taller element of the shared living building is located at the western end of the building to act as a wayfinding marker for Down Lane Park and the wider district centre. It reinforces the spatial hierarchy of the wider District Centre, transitioning down from taller buildings located towards Tottenham Hale Station. Its location and orientation was also driven by iterative testing of the most optimal location for height on the site. Following a detailed pre-application process, QRP members and officers are supportive of the height and massing proposed. Further information on the suitability of the site for development of this height and scale is provided in the DAS, Planning Statement and

	Townscape Visual Impact Assessment (included within the ES). It is important to note the significant planning benefits also delivered by the scheme, as listed at the start of this letter.
Queries in relation to the deliverability of the extant scheme	Some comments seek further information as to the deliverability of the previous scheme, approved under the extant consent. There has been no further activity at the Site following site clearance and the delivery of the schemes has been stalled since 2023. The approved development was no longer considered deliverable, leading to the previous owner's sale of the Site to the Applicant to bring forward new proposals. 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. 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. There is now a necessary impetus to unlock stalled brownfield sites that can deliver much needed market homes and affordable homes, which shifts the framework of the area. 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. 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. The Site is considered suitable for a mixed-use

	development and a revisited scheme that will be to current standards and requirements, respond to the current market and economic context, the updated townscape context, and can contribute to the completion of the ARSM, regeneration of the Tottenham Hale District Centre, and the objectives of the Shaping Tottenham Strategy.
Queries in relation to the proposed energy strategy and possibility to increase carbon reductions	Some comments ask whether the energy strategy has fully explored alternative low-carbon heat sources and whether further carbon reductions, and lower heating costs for residents, could be achieved. The alternative sources raised include secondary heat from London Underground ventilation shafts, ground source heat storage and a shared fifth-generation heat network. The energy strategy follows the London Plan energy hierarchy and is fossil-fuel free. It combines a high-performing building fabric, air source heat pumps and roof-mounted PV, which together achieve approximately 60% carbon reduction at the 'Be Green' stage, exceeding the GLA requirement. Further detail is provided in the Energy Assessment prepared by Meinhardt and in the separate energy and sustainability response provided to the Council on 5 November 2026. The Applicant has looked into the potential for secondary heat from the Underground and has engaged with TfL, the operator of the Bunhill heat network and Energetik. Underground waste heat is low-grade (c.30–40°C), so heat pumps must raise it to the 60–80°C would be required. In any event. extracting and distributing it would need network-scale infrastructure crossing third-party land, which is not feasible as part of this Application. The Bunhill scheme also benefits from being located directly above a disused station, which is not the case here, and its operator has advised that a connection is not currently feasible. Opportunities of this kind, including ground heat storage between seasons, are therefore best delivered at a network scale by heat network operators, TfL and the Council, rather than by an individual development. Importantly, as set out in response to Energetik above, the development is future-proofed for connection to potential future DEN, or to any future heat network drawing on secondary heat sources, once available. The Applicant is content to agree to relevant conditions/obligations to secure this.
Shared living land use queries	Some objections query the benefits of shared living and its appropriateness as a housing typology. In response, the development plan provides positive support for co-living in land use terms in locations like Tottenham Hale. The submitted DAS,

	Planning Statement and Shared Living Needs Assessment. The Needs Assessment submitted with the application provide clear justification for the proposed land use mix. The scheme's co-living component is firmly supported by development plan policy given the evidenced need for this accommodation, its role in supporting mixed and balanced community objectives in Tottenham Hale, and as it supports and helps unlock the scheme's wider local benefits. The development has been designed to adhere to London Plan Policy H15, and the GLA's Purpose Built Shared Living London Planning Guidance, to ensure that the proposed accommodation, is amenities and its operations are acceptable. It is important to recognise that some of the representations made by third parties commend the scheme's role in maximising housing choices, the opportunity to live in high quality accommodation with a range of amenities. The responses relating to the principle of co-living are therefore mixed.
Employment provision	Many of the supportive responses cite the opportunity for the provision of new jobs, though construction and operation, that large scale regeneration projects bring to the locality. Through the S106 obligations, the Applicant will also ensure extensive training and apprenticeship opportunities. The Applicant is also committed to seeking to utilise local skills and trades.
Impacts on Down Lane Park	Some comments note that there will be more users of Down Lane Park and that this will put pressure on the open space asset locally. The extant consent and the wider masterplan always anticipated a significant increase in population at Tottenham Hale and S106 contributions have been collected and continue to be sought, in relation to improvements to the park which will hopefully be delivered by the Council in due course. The proposed development will also raise additional financial contributions to be spent locally, as well as itself including new public realm, providing a key part of the 'green link' through the centre of the Ashley Park site which leads directly into the park. This route itself provides new public realm, urban greening, play space and seating. All new residents will also have access to provide or communal outdoor amenity space, ensuring that they have some external space and are not entirely reliant on the park.
Overlooking and privacy concerns	Some comments raise the potential for overlooking given the proximity of the new building to existing buildings in the locality. In this dense urban context, within a designated regeneration area where significant new development has been anticipated for a number of years, building in relatively close proximity to one another is not unexpected and is typical of this context. The

	orientation of the buildings and organisation of fenestration seeks to respond to this where possible. Adequate separation distances are also maintained that are of a similar nature to existing separation distances in the immediate context.
Potential for disturbance from use of roof terraces	Queries have been raised as to the relatively close separation distances to the proposed roof terrace of the shared living building and the potential for disturbance from users of the terrace. Appropriate separate distances are maintained, and the entire building, including all communal spaces especially external outdoor spaces, is professionally managed. The hours of use and staffing of the roof terrace, as well as agreement to no amplified music and appropriate lighting outside of normal working hours will all be secured through an Operational Management Plan, to be secured by condition.
Preference for removal of the deck access/ communal walkway of the affordable housing building due to proximity with Rosa Luxemburg	The separation between the Rosa Luxemburg building and the proposed affordable housing block is appropriate in the context of this dense urban environment. It follows existing separation distances experienced elsewhere in the vicinity of the site. The deck access provides a buffer, with the block set back behind the deck, rather than being built right up to the boundary. The deck access typology provides dual aspect homes, improving daylight/sunlight, and has been praised by the GLA. The location of the deck access to the rear of the building, rather than the public face of the scheme is a typical approach to designing this typology. It would be inappropriate to introduce deck access along the scheme's principal 'front' elevation. The deck access arrangement will not adversely impact on residents of the Rosa Luxumberg, with this building also built in relatively close proximity to its own site boundary, acknowledging the dense, urban environment and typology of housing (ie: a square courtyard style block) intentionally being created. The principle of deck access and the configuration of the scheme in this regard has been informed by pre-application engagement with Officers, the GLA, 3x QRP sessions and meetings with the Council's Housing team. The scheme is the culmination of thee discussions and these stakeholders are all supportive of the principle of a deck access arrangement and the location of the decks. Meetings also took place with Designing Out Crime officers, heavily engaged to assist in designing out opportunities for potential antisocial behaviour on the communal walkways. Access is by fob-only to residents of a particular floor only, with no through-route. It is commented that light from the deck may be a nuisance, and to combat this, lighting can be shielded, warm, and dimmed at night.

Potential for overheating	The proposed development has been assessed against relevant guidance to reduce overheating and minimise the use of air conditioning. Perforated panels are provided at relevant locations across the shared living building with overheating sensitivity and overhanging balconies are proposed to assist at the affordable housing block (which has less potential for overheating given its height and location), incorporating passive measures into the façade design. Please refer to the Overheating Assessment included within the Energy Assessment, prepared by Meinhardt for details.
Wind and micro-climate impacts	The proposals have been designed with regard to wind and microclimate impacts, and with mitigation measures in place, the development is considered to be acceptable. Both CFD and wind tunnel testing have now been submitted, to verify the results of each methodology and testing. Please refer to the Wind Microclimate Assessment, prepared by GIA, for details
Noise impacts	The proposals adhere to relevant policy requirements regarding minimising and managing noise and vibration impacts, and with mitigation measures in place, the development is considered to be acceptable. Please refer to the Noise Impact Assessment, prepared by Trium, for details.
Positivity around proposed community space	Supportive responses confirm that local people want to be involved in their local community. The community space provision on site and the communal nature of the shared living development enables and encourages this.
Eastern building line of the affordable housing block projecting forwards of the agreed building line and encroaching on to the widened west side of Ashley Road	Boundary information provided during determination of the application shows that a strip of land on the western side of Ashley Road, adopted as public highway, overlaps with the eastern edge of the affordable housing building, as originally submitted. It is also acknowledged that the affordable housing block originally projected forward of the neighbouring ground floor building line of the adjacent building lines to the north. This has now been reviewed and the building's footprint amended, to align the eastern building line with the Rosa Luxemburg building and sit wholly outside the adopted highways. An updated set of planning drawings, accompanied by statements from the Applicant team confirming the conformity of the amendments with the submitted technical assessments are provided under separate cover to amend the scheme and remedy this point.
Quantum of commercial floorspace and double-height provision at other commercial units within the masterplan, and extent of active frontage this creates	Some objections have raised that the quantum of commercial space is reduced from the extant consent. Some supporters have noted the general provision of commercial floorspace is positive. The quantum of commercial space has been the output of extensive commercial strategy advice and discussions with local businesses throughout the pre-application process to ensure the commercial

	offer is market driven and limits the likelihood of vacancy. The units are anticipated to be small, local shops or food and beverage offers, activating the corners of Ashley Road. Their size and scale appropriately caters for this function and use. Please refer to the AND Commercial Strategy for further information. The extent of active frontage is strong within the proposals achieving 75% active frontage. Almost the entire frontage of the shared living building facing the green link is activated through communal amenities and the commercial and community floorspaces, some of which is double height. Though the shared living facilities are not 'town centre uses', given the nature of the building, they are considered to be highly active. At the affordable housing block, maisonette homes with front doors and front gardens are provided to activate the green link. The location of non-commercial uses is strategically placed on the corners of Ashley Road, and facing the park, where they will have a positive impact on the vibrancy of the surrounding streets. While there may have been more commercial space within the extant consent, the active frontage is not dissimilar.
Completion of the Rosa Luxemburg courtyard	Third party comments highlight that the development does not 'complete' the courtyard, unlike the extant permission at the site. The extant consent did include a completed courtyard to the south of the Rosa Luxemburg building. The applicant initially explored the option of retaining a similar courtyard arrangement, however Officers and the Councils Housing team were clear that this arrangement was no longer considered appropriate early during pre-application discussions. It was considered that the integration of a courtyard space through two separate developments would result in an incoherent space and would result in an excessive sense of enclosure. From the outset of pre-application discussions, planning and design officers were clear that a linear building which addressed the northern side of the Ashley Link was the most appropriate design solution for the site. This view was corroborated during separate discussions with the Council's housing team. The approach taken by the development enables the ground floor level units to be supported by private gardens. This offers a significant benefit to families within the borough.