10 November 2026

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Dear Philip,

Re: Ashley Park, Environmental Statement Review – Ref: HGY/2026/2421

This letter constitutes the response of Re:Shape T Ltd (the Applicant) to the Environmental Statement ('ES') Review (dated 21 October 2026) prepared by Ramboll on behalf of the London Borough of Haringey ('LBH') in relation to planning application reference HGY/2026/2421, pertaining to the redevelopment at the Former Ashley House site, Ashley Road, London, N17 9LZ.

The ES Review did not raise any potential Regulation 25 requests, where in the reviewer's opinion, 'further information' may be needed by LB Haringey in order to reach a 'reasoned conclusion' on the likely significant effects of the Proposed Development.

The ES Review did raise some clarificatory matters, which have been answered within this letter. Table 1 sets out the clarification point raised, and the Applicant's response.

The responses provided to the points raised do not alter the assessments undertaken or scale and nature of effects presented within the ES. Therefore, the ES submitted remains valid and appropriate for the LBH to use to reach a reasoned conclusion on the likely significant effects associated with the Proposed Development.

Kind regards,



Laura Ratcliffe
Principal Consultant
For and on behalf of Trium Environmental Consulting LLP

Cc Rachel Naylor, Trium

Table 1 Responses to ES Clarifications Raised within the ES Review

Ref.	ES Clarifications Raised within the ES Review	Applicant Response
Chapter 5: Socio-Economics		
SE1 (4.3.1)	A general expectation of contributions must not be represented as demonstrated mitigation of that effect. • Confirm with the relevant healthcare body the additional demand, deliverable capacity response, contribution basis and phase-specific payment/delivery triggers. • Substantiate and secure the Down Lane Park play improvements, their accessibility and capacity, and delivery relative to occupation, after reconciling on-site play requirements.	Financial contributions are presented as a *potential* mitigation measure that *may* be secured through the planning process; however, the assessment does not assume that such contributions would mitigate the identified effect. As set out in paragraphs 6.113 and 6.114 of the ES chapter, the scale, timing and application of contributions cannot be confirmed at this stage and therefore no mitigation benefit has been attributed to the assessment presented in the chapter. The residual effect remains Moderate Adverse (**significant**), reflecting a precautionary approach of not applying mitigation. Confirmation of the healthcare demand, any associated capacity response, contribution requirements and phase-specific payment/ delivery triggers will need to be agreed between the Applicant, the relevant healthcare body and the Local Planning Authority (LPA) in due course. These matters haven't been determined pre-submission of the planning application, and as is standard practice, will be determined through the planning application process and any associated consultation with the relevant healthcare stakeholders will take place through this process. Similarly, the accessibility, capacity and delivery of improvements to Down Lane Park, and their relationship to occupation of the Proposed Development and on-site play provision, are matters to be agreed through the planning process and have not been relied upon to reduce the scale, and thus significance, of effects reported within the assessment.
SE2 (4.3.2)	The mitigation schedule contains no specific outcome-monitoring programme. The Applicant should clarify how occupation, public/play-space availability and any infrastructure obligations would be monitoring across phases, with contingency arrangements where delivery is delayed.	Matters relating to monitoring, phased delivery, compliance with planning obligations and any associated contingency arrangements are outside the scope of the socio-economic assessment and would be addressed through the planning application process, including any planning conditions and/ or legal agreements. Any requirements for monitoring occupation, public/play-space provision and infrastructure delivery across phases would be determined by the local planning authority in consultation with the Applicant.
Chapter 6: Noise and Vibration		
NV1 (5.2.5)	Annexes 3 and 4 and an auditable receptor calculation schedule are required. Plant is represented by a point source at each phase centre: excluding screening is conservative, but this does not establish that central source locations bound works close to receptors. Near-boundary activities, source heights, operating times and simultaneous works require sensitivity testing or justification. Vibration is assessed by piling-distance bands rather than site-specific predictions; ground conditions, piling method and actual separations should substantiate those bands.	All receptors are classed in the "A" category of Annex E.3.2 of BS 5228-1, as inferred by the Magnitude of Impact ratings included in Table 7.2. This is the lowest threshold category, so additional clarifications around receptor sensitivity is not necessary for establishing significant effects. The calculations were completed within a model of the site that takes into account screening, distance and reflections. The request for a full calculation schedule is not standard practice and not something that would be provided within an ES – it would not change the effects presented. Annex 4 contains assumptions on sources used in the modelling, including source terms, sound power levels, duty times, and quantities. The overall effects described in the report show significant effects during construction. It is acknowledged that activities taking place closer to the boundary could result in elevated sound pressure levels than those presented, but these would be isolated occurances on a temporary basis during limited periods of working days.I However, during other periods, plant may be working at greater distances from a receptor than that assessed, and the $L_{Aeq, T}$ is presented as an average over the entire working day to account for this (with other conservative and reasonable worst case assumptions also applied). This is standard practice and established and agreed methodology for noise assessments within an ES. There are also good reasons why elevated levels during periods where plant is working closer to boundaries may not happen: • Sources closer to the boundary will likely experience greater attenuation losses due to the presence of the hoarding (not included in the model); and • The single point source in the centre of the site is based on all activities taking place simultaneously at this position (as set out in Annex 4 of the ES). In practice this cannot occur, so predictions of single sources at the boundary will likely show similar sound pressure levels at the receptors, i.e. the reduction in source sound power level will counter the reduced distance attenuation. At this stage, without a Contractor appointed, it is unknown exactly how the building will be constructed. The prediction methodology is consistent with other applications of a similar nature and provides a reasonable approach for establishing significant effects.

		With regards the Review point relating to vibration, the piling rig assumptions are provided in Annex 4, i.e. CFA. The calculations presented in the chapter are based on historical data included in Annex C and D of BS 5228-2 (see Paragraph 7.78) in which piling works have been undertaken in similar soil formations and ground conditions, and therefore inherently include typical soil conditions representative of those likely to be present at the Site. The calculation of potential Peak Particle Velocity (PPV) vibration levels at receptors considers the shortest possible distance from the site to the receptors, as described in Paragraph 7.79. The predictions for vibration are based on worst-case readings of the historical library data in BS 5228-2, and there is evidence in BS 5228-2 to illustrate that lower vibration levels will be achieved at receptors within 20m in similar ground conditions. Assessments based on previous piling undertaken in similar ground conditions is typical at this stage of assessment, when detailed piling method statements and piling specific ground investigations have not been undertaken. Nevertheless, significant effects due to vibration have been reported and further analysis would not result in other effects.
NV2 (5.3.4)	Nineteen representative receptor groups are identified, including surrounding homes, a hotel, Berol House uses, Welbourne Health Centre and Harris Academy. Vacant 11, 13, 15 and 17 Hale Road are assessed separately in Annex 5; their exclusion from the main results requires verification of occupancy assumptions and reporting of potential effects.	Occupation assumptions were based upon feedback provided by LBH officers during the EIA scoping and pre-application process, as well as a site visit which showed these buildings as being unoccupied and/or boarded. The EIA should be based upon reasonable and likely scenarios, and as it is not reasonable or likely that these properties would contain residents, they were therefore excluded from the technical chapters of the ES. However, for completeness, and in the unlikely event that these properties became occupied in the future, a supplementary assessment was undertaken of them and included in the appendices of the ES, with any likely significant effects included within the concluding chapters of the main body of the ES.
NV3 (5.6.1)	Proposed mitigation comprises Best Practicable Means, source selection and maintenance, equipment siting, local screening/enclosures, operating-time controls and liaison through the Construction Environmental Management Plan (CEMP). The chapter proposes mitigation through Section 61 prior consent with Haringey, monitored noise and vibration limits, reporting and variation procedures. A Piling Method Statement, appropriate low-vibration techniques such as CFA or similar, vibration monitoring and action levels are proposed before piling. Monthly audits are described. These are suitable management mechanisms in principle, but the detailed measures, responsibilities, receptor limits, monitoring locations and frequency and exceedance-response arrangements require definition and securing.	The details requested are typically not available during the pre-application process, and it is standard that these measures are developed during the planning process, and approved through the discharge of relevant planning conditions and Control of Pollution Act (COPA) processes described. The CEMP and Section 61 can include this level of information, which is proportionate and typical.
Chapter 8: Wind Microclimate		
WM1 (6.6.3)	The Applicant should confirm the final planting schedule, installation dimensions, canopy/porosity and seasonal assumptions, and demonstrate that the revised layout achieves the targets from first use.	The Applicant notes the comment. The final planting schedule will be confirmed. Should wind-critical landscaping change between application and implementation, this will be reviewed by an experienced wind engineer. If targeted CFD testing is required this will be performed.

	Targeted CFD retesting may be needed if landscaping changes between application and implementation.	
Chapter 9: Daylight, Sunlight, Overshadowing and Solar Glare		
DSO1 (7.2.1)	The principal benchmarks are the BRE daylight, sunlight and overshadowing guidance, with policy addressed in Annex 10. The Applicant should confirm the guidance edition and demonstrate the applicable planning-policy context.	As noted in Annex 10, the ES chapter has been written in line with the BRE 209 (2022) Document. Annex 10 provides a summary of all relevant National, Regional and Local policy relevant to Daylight, Sunlight, Overshadowing and Solar Glare. This includes reference from Haringey's Draft Local Plan Policy D11 which cites the BRE Guidance as the relevant guidance for checking proposals against.
DSO2 (7.2.4)	The APSH logical tests and the reversed wording of the sun-on-ground summary in Table 9.1 should be reconciled with the methodology and calculation implementation. Baseline NSL tables also require an explanation of the absolute criterion used to label existing rooms compliant, distinct from the relative-change test. Model assumptions, including the standard 4.27m room depth where layouts are unknown, require receptor-specific justification and sensitivity checks where material.	In regard to APSH, Table 9.1 of ES Chapter 9 sets out the criteria provided by the BRE Guidance at 3.2.6-3.2.7 of the BRE Guidance. When read alongside sections 9.71-9.74 of the ES Chapter 9, the sufficient level of detail on APSH methodology is provided, and no further clarificatory information is deemed necessary. In regard to the Sun On Ground summary in Table 9.1, again this is informed by the BRE Guidance at 3.3.7 – 3.3.11. When read alongside 9.77 – 9.78 of Chapter 9, sufficient methodology is provided. The wording is simply inversed in Table 9.1 to fit the narrative for the other assessments. The baseline NSL compliance has been determined by a room achieving 80% NSL or over in the existing baseline scenario. This is intended to reflect the 80% / 0.8 retained levels in the completed development scenario. The assumed room depth of 4.27m is, as noted by the reviewer, industry standard. This has been applied wherever appropriate. Where this is deemed to not be appropriate, e.g. where the building depth suggests a shallower room may be present for example, this has been reviewed on a case-by-case basis. It is not deemed relevant or reasonable to have to justify every application of assumption. The modelling of each property can be determined through interrogation of the detailed results sheets throughout the Annexes. Where a property has been noted as 'Residential' this indicates room layouts were not available and assumptions have been made.
DSO3 (7.3.2)	Low baseline levels can increase proportional losses but also indicate the existing constraint; both relative change and absolute retained amenity should be reported. The description of the cleared-site outlook as temporary is context, not a reason to substitute unbuilt consented development for the actual baseline.	Both relative change and absolute retained amenity levels for Daylight and Sunlight are detailed within the Annex 2 and the overshadowing levels detailed within Annex 7 associated with ES Chapter 9.
DSO4 (7.3.3)	Occupancy assumptions and detailed effects for vacant 11, 13, 15 and 17 Hale Road properties require verification against Annex 11, with their significance reported transparently because occupation could change. A consistent scenario schedule should distinguish existing development, future commitments, combined effects and the incremental effect on future receptors; topic-specific treatment of 29–33 The Hale should be explained against its actual construction status	Refer to the response for NV2 (5.3.4). The approach taken in relation to the Hale Road properties was set out during the Scoping Process and is additionally set out in 9.92 of Chapter 9. We are unclear on what the reviewer is requesting in relation to future development / receptors. It is considered that the various scenarios within Chapter cover all relevant outcomes. The list of cumulative schemes follows what was set out in the EIA Scoping Report, which specifically highlights 29-33 The Hale as a cumulative potential future receptor. As such within Chapter 9, this development has been treated as a cumulative scheme (and potential future receptor) within the cumulative assessment.
DSO5 (7.4.3)	Seventeen of 19 existing amenity areas are reported to meet the change criteria. Rosa Luxemburg Apartment's Area 17 falls from 73% to 0% of its area	It is agreed that the wording on the overshadowing impact to Rosa Luxemburg Apartments should be amended to clarify the position. Section 9.247 should be amended to read: "R*egarding Area 17, the community play space to occupiers of the Rosa Luxemburg Apartments, this would experience a reduction in area achieving the recommended 2*

	receiving two hours of sunlight on 21 March, a Major Adverse significant effect. This is loss of the qualifying two-hour area, not necessarily all sunlight at every location and time; the reporting should maintain that distinction. The Gessner falls from approximately 17% to 13%, classified Minor Adverse. Unrounded figures are needed to verify the reported 22% relative reduction and proximity to the threshold. Down Lane Park and its assessed sports/play areas are reported as Negligible under sun-on-ground, while transient shadow is Minor Adverse.	*hours of sunlight on March 21st from 73% to 0%. Notwithstanding this, the area does still achieve some sunlight on March 21st, just less than the recommended 2 hours…*" In relation to the impact to the Gessner, it is acknowledged that whilst the proportion retained valued of 0.78 is correct, the equivalent figure as a percentage should be 23% not the stated 22%. This does not affect the conclusions of the chapter, and the effect would still be Minor Adverse. For ease the unrounded numbers and calculation method have been provided below: • Total area sq.m = 761.99; • Existing area receiving more than 2 hours of sun on March 21st sq.m = 129.35; • Existing area receiving more than 2 hours of sun on March 21st % = 129.35 / 761.99 = 0.169 *100 = 16.97%; • Proposed area receiving more than 2 hours of sun on March 21st sq.m = 101.88; • Existing area receiving more than 2 hours of sun on March 21st % = 101.08 / 761.99 = 0.132 *100 = 13.265%; and • Proportion retained = 101.08 / 129.35 = 0.781 or 22.9% In relation to Down Lane Park, the sun on ground assessments show full compliance with the BRE Guidance and therefore are considered negligible, as set out in section 9.78 of Chapter 9. For transient shadow, there is no numerical criteria set out in the BRE and so as stated at 9.76, the effects are based on professional judgement. As Down Lane Park does experience some additional shadow albeit non-material amounts, the effect is considered to be minor adverse. A negligible effect would most likely be limited to no additional shadow path occurring in this space. Both conclusions are deemed to be non-significant and in line with the methodology set out in the Chapter.
DSO6 (7.5.1)	The quantified cumulative scenario includes Berol Quarter and 29–33 The Hale. In addition to the principal significant effects, daylight effects become Moderate Adverse at East Apartments and Major Adverse at The Gessner, Ferry Island Building 3 and 165–195 High Cross Road. Major Adverse overshadowing is reported at Rosa Luxemburg Apartments, The Gessner and Sessile amenity spaces. Existing significant effects must remain visible even where other schemes drive the additional losses.	All significant effects as a result of the Completed Development Scenario are identified within the residual effects table at Table 9.9 of ES Chapter 9. Increased effects as a result of the Cumulative Scenario are identified in from Section 9.300 onwards in ES Chapter 9. Where an effect increases in the Cumulative Scenario, this is identified with justification where relevant. It is acknowledged however that this does not override or supersede any significant effects caused by the Completed Development Scenario.
Townscape and Visual		
TV1 (8.3.4)	It is therefore not clear how far the ZTV extended based on Figure 3.1. (Figure 6.1 presents a much clearer picture of the ZTV.	A ZTV has been prepared for a distance of 2sqkm from the centre of the site. This has informed the study area for each discipline, including the identification of heritage assets, townscape character areas and visual receptors. This is illustrated within each section where the ZTV is overlaid with the study area (see Figure 6.1 and Figure 7.1).