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Planning Policy
 Freepost LON 11863
 London Borough of Haringey
 639 High Road
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 N17 8BD

21 June 2010
 Our Ref: AW/036177

Dear Sir/ Madam

Haringey Local Development Framework

Core Strategy Proposed Submission Paper

1. We write to you on behalf of our client, **National Grid Property (NGP)** to submit representations to the London Borough of Haringey's Core Strategy Proposed Submission Paper (CSPS) (June 2010).

NGP

2. NGP provides expert strategic advice and effective management of property issues on behalf of National Grid. NGP's portfolio comprises some 1,450 properties and land holdings on 660 sites throughout the UK. The property consists of offices, depots, houses and land, which are used for National Grid's business operations, let to third parties, or surplus to requirement.

Clarendon Square at Haringey Heartlands

3. In March 2009, NGP submitted an outline planning application for the site known as Clarendon Square, which forms part of the Haringey Heartlands area. This application is currently being considered by the Council.
4. The outline planning application seeks permission for a residential led mixed-use development comprising:
 - Between 1,100 to 1,200 sq m residential units (C3);
 - 460 sq m to 700 sq m of office uses (B1);
 - 370 sq m to 700 sq m of retail/ financial and professional services uses (A1/ A2);
 - 190 sq m to 550 sq m of restaurant/ café/ drinking establishment uses (A3/ A4);



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- 325 sq m to 550 sq m of community / assembly / leisure uses (D1 / D2);
 - New landscaping;
 - Public and private open space;
 - An energy centre;
 - Two utility compounds;
 - Up to 251 car parking spaces;
 - Cycle parking; and
 - Access and other associated infrastructure works.
5. The application seeks to fix access with matters of scale, layout, landscape and appearance being determined at Reserved Matters stage.
 6. The scheme provides a unique opportunity to bring derelict and underused industrial and employment land back into effective use by providing a residential led mixed-use development that will create a new and vibrant urban quarter. The realisation of these proposals are essential in integrating Clarendon Square into the wider area and existing communities to ensure the sustainable regeneration of this strategically important brownfield site, which has been identified in the UDP and the London Plan as a major regeneration area. The Clarendon Square development represents the first phase of the regeneration of the Haringey Heartlands Development Framework area on the Eastern Utilities land.

Site History

7. The 'Haringey Heartlands Development Framework' was formally adopted by the Council in April 2005. The development framework sets out the preferred approach to the redevelopment of the site.
8. To facilitate the development of the Haringey Heartlands Development Framework area, the LBH applied for planning permission for a 'Spine Road' to run through the site in a north/south direction. Planning permission was granted in January 2007 and the spine road was completed in May 2008.
9. It was agreed with the Council that the best strategy for bringing the site forward for redevelopment was to submit an outline planning application to establish the development principles for the area.
10. MAKE architects were appointed in January 2007 to formulate designs for a new urban quarter at the site. This process has included consultation with the London Borough of Haringey (LBH), the Greater London Authority (GLA), Design for London (DfL), Transport for London and CABE, pre and post application submission. In addition, local residents have been engaged in this process through various consultation exercises.

Core Strategy Proposed Submission

11. The Core Strategy will set out the Council's vision and key policies for the future development of the Borough up to 2026. It will outline how the Council intends to deliver local and strategic development needs including housing, employment, leisure and retail provision.
12. We have reviewed the document and set out our comments below:



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Making Haringey Distinctive

13. Chapter 1 sets out the various Area Assemblies within Haringey, including Wood Green Assembly, in which Haringey Heartlands falls. In Figure 1.9 'Wood Green', the Eastern Utilities area is designated as an employment area. NGP considers that this designation is contrary to the London Plan (2008), which states that this is an 'Area of Intensification' and should provide a mix of uses. Therefore, we urge LBH to remove this designation, and refer to Haringey Heartlands as an 'Intensification Area', in accordance with the London Plan. 14/11/11 357
14. Page 32 of the Core Strategy acknowledges the London Plan 'Haringey Heartlands/ Wood Green' designation, which seeks 1,500 new jobs and 1,700 new homes as part of the mixed use redevelopment of the site. NGP welcomes the redevelopment of the Haringey Heartlands area. However, NGP considers that the majority of employment provision proposed, should be located at the North of Coburg Road. This area is better suited to employment related uses, due to its location near existing public transport infrastructure and Wood Green town centre. 14/2/14 358

Spatial Objectives

15. Chapter 1 sets out the following spatial objectives for the London Borough of Haringey:
- People at the Heart of Change;
 - An Environmentally Sustainable Future;
 - Economic Vitality and Prosperity Shared by All;
 - Safer for All;
 - Healthier People with a Better Quality of Life;
 - People and Customer Focused (CSPS, page 46).
16. NGP continues to broadly support these objectives, and welcomes the inclusion of these in the Core Strategy. 14/2/11.5 359

Key Principles

17. Chapter 1 sets out the following key principles for the London Borough of Haringey:
- Making the best use of Haringey's land;
 - Reinforce a sense of place;
 - Integrate transport and land use;
 - Work in partnership;
 - Conserve and reuse resources;
 - Diversify and grow the economy;
 - Good design from the outset;
 - Access to open space;
 - Support health and community well being; and
 - Support community cohesion and civic engagement. 14/4/11.5 362



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18. NGP welcomes these principles. Specifically, our client supports 'Making the best use of Haringey's land', which seeks to create sustainable communities, particularly at Haringey Heartlands.

Haringey's Growth Areas

19. Chapter 2, Paragraph 2.1.4, states that Haringey Heartlands and Tottenham Hale will be the key locations for the largest amount of Haringey's future growth. NGP welcomes this paragraph and considers that the submitted application at Clarendon Square, which focuses growth at Haringey Heartlands, accords with this strategy. 14/5/2
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20. Figure 2.1 'Haringey Core Strategy Key Diagram' designates Haringey Heartlands as 'Strategic Industrial Land'. NGP objects to this designation and considers that it is contrary to the London Plan and the Draft London Plan (2009), which state that it is an 'Intensification Area', and should provide 1,700 new homes in addition to employment space. Consequently, NGP considers that Figure 2.1 text should refer to Haringey Heartlands as an 'Intensification Area' rather than 'Strategic Industrial Land' to ensure conformity with the London Plan. 14/6/2
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Density

21. Chapter 2, Paragraph 2.1.8 states:

'The Council will encourage high densities in the most accessible parts of the borough (generally Tottenham Hale, Haringey Heartlands and Wood Green Metropolitan Town Centre..... The Council will expect the density of housing development to comply with the Density Matrix in the London Plan (Table 3A.2)'

22. NGP welcomes Paragraph 2.1.8, and considers Haringey Heartlands suitable for high density development due to its accessible nature. However, our client urges LBH to consider the London Plan Density Matrix as a guidance tool only. 14/7/2
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SP1 – Managing Growth

23. NGP supports Strategic Policy 1 (page 59), which promotes development in the Haringey Heartlands Growth Area. The location of Haringey Heartlands, close to Wood Green with good transport access, will assist the development of sustainable communities and support the Core Strategy Vision and spatial objectives. 14/8/2
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Growth Areas - Haringey Heartlands

24. 'Growth Areas – Haringey Heartlands' sets out the vision for the Wood Green and Haringey Heartlands area. 14/9/2
375
25. Paragraph 3.1.9 identifies development opportunities located within Haringey Heartlands, including Clarendon Road Gas Works. NGP supports the recognition of Clarendon Road Gas Works as a development opportunity and considers that there is significant scope for the enhancement of these areas.
26. On page 61, LBH has identified aspirations for the development of Haringey Heartlands, including the Eastern Utility Lands.



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27. For the wider Haringey Heartlands area, key aspirations include the reuse of brownfield land to maximise capacity for housing and the need to integrate the Heartlands with the wider area to provide sustainable development. NGP considers that the redevelopment of Clarendon Square will address these challenges and maximise these opportunities.
28. With regard to the Eastern Utility Lands, key aspirations include:
- A mix of uses including substantial new housing, restaurant/ café/ drinking establishments uses and community uses;
 - A mix of office use; and
 - Excellent public realm.
29. NGP considers that the proposed development application at Clarendon Square will assist in the regeneration of the wider Haringey Heartlands area and the Eastern Utility Land. The development will provide new homes and a series of public open spaces throughout the site, including a new public square.

14/10/2
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SP2 – Housing

30. Strategic Policy 2 (page 79) sets out a requirement for the Borough to deliver 6,800 homes during the plan period. However, we consider that LBH should have regard to the higher housing targets set out in the Draft London Plan. The provision of up to 1,200 homes on the site at Clarendon Square will help the Council to meet its housing target and accommodate the Borough's growing population.
31. The need to provide affordable housing is recognised. NGP considers that affordable housing requirements should be assessed on a case by case basis to take into account exceptional development costs, such as remediation and decommissioning of operational structures.
32. It is also important to note that the 50% affordable housing requirement set out in the London Plan is an overall strategic target rather than an individual site requirement, and that the London Plan seeks to encourage rather than restrain new residential development.

14/10/2
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14/12/3
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SP4 – Working towards a Low Carbon Haringey

33. Strategic Policy 4 (page 90) seeks to ensure that all new developments take measures to reduce energy use and carbon emissions. It states that all new developments will be required, where viable, to achieve a reduction in predicted carbon dioxide emissions of 20%, from on site renewable energy regeneration.
34. Strategic Policy 4 does not accurately reflect London Plan Policy 4A.7 which states:
- 'The Mayor will, and boroughs should, in their DPDs adopt a presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from on site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible' (p.205).*
35. NGP considers that Strategic Policy 3 should use exactly the same wording as London Plan Policy 4A.7 in its entirety including the statement '*unless it can be demonstrated that such provision is not feasible*'.

14/12/3
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SP7 – Transport

- 14/14/14
36. Strategic Policy 7 (page 105) identifies infrastructure proposals which support Haringey's regeneration and access. Furthermore, it sets out the Council's approach to providing sustainable transport.
37. Specifically, NGP supports the section of the policy which seeks to locate major trip generating development locations with good access to public transport. The proposed development at Clarendon Square will contribute to this objective as it is within close proximity to Wood Green town centre which benefits from excellent access to public transport.
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SP8 – Employment

38. Strategic Policy 8 (page 113) sets out the need to protect and enhance employment land, while promoting other forms of employment that complement existing uses. It also states that the diversification of the Borough's economy should be encouraged to support new and expanding employment sectors.
39. Paragraph 5.1.25 (page 114) states that Strategic Policy 8 *'focuses on facilitating the restructuring of the borough's employment land portfolio to allow an increase in B1 floorspace whilst enabling the modernisation of old stock and managed transfer of obsolete industrial sites to alternative uses'*.
40. The proposed development at Clarendon Square will provide a range of employment generating uses such as retail, financial and professional, restaurant, bars, cafes and community and leisure uses to provide new facilities and employment opportunities for local residents.
41. The Clarendon Square site is currently an underused brownfield site. The proposed scheme, which is of a high density, will make efficient use of the site to reflect Haringey Heartlands' status in the London Plan as an 'Intensification Area'. In addition, it responds to guidance set out in the Haringey Heartlands Development Framework.
- 14/15/15
383

SP10 – Town Centres

42. Strategic Policy 10 (page 125) seeks to focus town centre uses in existing centres. It sets out the requirement for the expansion and intensification of town centres. Furthermore, Paragraph 5.3.5 (page 124) states that the Council will *'protect the boroughs 38 local centres as places that offer unique and often specialist goods and services to their immediate communities'*.
43. In accordance with PPS4 'Planning for Sustainable Economic Growth' (2009), NGP supports the protection of town centres. NGP also supports the identification of Wood Green as a Metropolitan Centre.
- 14/16/16
384

SP11 – Design

44. NGP supports Strategic Policy 11 (page 138), which sets out the Council's requirements for development to be of high quality design.
- 14/17/16.1
385

Tall Buildings

45. NGP welcomes Paragraph 6.1.17 (page 141), which identifies Haringey Heartlands, along with Tottenham Hale, as an area which is most suitable for tall buildings. NGP considers that this is in conformity with the London Plan's designation of Haringey Heartlands as an 'Intensification Area'.
- 14/18/16.1
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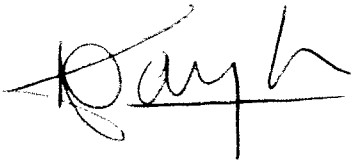
Section 106

46. NGP supports the reference made to Circular 05/2005 'Planning Obligations' and highlights the need for planning obligations to be directly related to the proposed development. In determining the need for planning obligation, NGP considers that the Borough should have regard to the economic viability of individual schemes. 387
47. With regard to the Community Infrastructure Levy (CIL), NGP requests that the Council provides further detail on the application of CIL to proposed developments within Haringey. NGP understands that further information will come forward in the proposed Community Infrastructure Plan, referred to at page 208. 388
14/20/08

On behalf of NGP, we request that we be kept informed of progress with this and future LDF documents, and wish to reserve our client's position to submit further representations on subsequent documents.

Should you wish to discuss our comments further, please contact Matthew Humphreys on 020 7303 3680 or Alex Wilson on 020 7303 4157

Yours faithfully



Nick Taylor
for Deloitte LLP (trading as Drivers Jonas Deloitte)

