

Drivers Jonas Deloitte.

Drivers Jonas Deloitte
66 Shoe Lane
London
EC4A 3BQ
Tel: +44 (0) 20 7007 9000
Fax: +44 (0) 20 7583 1198
www.djdeloitte.co.uk

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

Direct: +44 (0) 20 7303 4041
Direct Fax: +44 (0) 20 7583 1198
ntaylor@djdeloitte.co.uk

2 December 2010

Dear Sir/ Madam

Haringey Local Development Framework

Core Strategy – Additional Regulation 27 on Affordable Housing and Employment Land Designations

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 Additional Regulation 27 on Affordable Housing and Employment Land Designations (November 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);
 - 325 sq m to 550 sq m of community / assembly / leisure uses (D1 / D2);
 - New landscaping;

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 2 New Street Square, London EC4A 3BZ United Kingdom

Drivers Jonas Deloitte is a trading name of Deloitte LLP, which is the United Kingdom member firm of Deloitte Touche Tohmatsu ("DTT"), a Swiss Verein, whose member firms are legally separate and independent entities. Please see www.deloitte.co.uk/about for a detailed description of the legal structure of DTT and its member firms. Drivers Jonas Deloitte is regulated by RICS.

Member of Deloitte Touche Tohmatsu

- 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 will integrate Clarendon Square into the wider area and 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 Additional Regulation 27 on Affordable Housing and Employment Land Designations

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:

SP2 – Housing

13. Strategic Policy 2 (page 5) seeks to maximise the supply of additional housing to meet or exceed the target of 6,800 homes from 2007 – 2017, equating to 680 units per annum.

14. Notably, paragraphs 3.2.4 and 3.2.5 acknowledge the Draft Replacement London Plan housing target of 820 units per annum for the LBH. This figure is based on the GLA Strategic Housing Land Availability Assessment (SHLAA) (2009), which Haringey Borough Council fed into. This study is up to date and supersedes the GLA London Housing Capacity Study undertaken in 2004, which set the target of 6,800 homes.
15. As set out in NGP's representations, dated 21 June 2010, our client welcomes the consideration of the higher housing targets set out in the Draft Replacement London Plan and supports an increase in housing targets post 2011, once the Draft Replacement London Plan targets are agreed. 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.
16. NGP notes the increase of the affordable housing threshold to 10 units. 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.
17. As set out in the consultation document, the London Mayor intends to remove the 50% London-wide target. However, the Council considers that based on housing studies, the borough can justify a target of at least 50% affordable housing. 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. Therefore, NGP welcomes the Council's acknowledgement that this target should be applied sensitively, in order not to restrain residential development.
18. NGP notes the Council's aspirations to increase the wheelchair accessible units target to 20% after 2016. If this target is implemented, NGP considers that it should apply to future planning applications only.

SP8 Employment

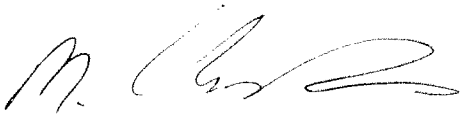
19. NGP notes the Council's target to protect the borough's hierarchy of employment land. NGP welcomes the need to take a flexible approach to protecting employment areas. Specifically, NGP supports paragraph 5.1.4 which acknowledges the need to release employment areas, no longer suitable for industrial or employment generating uses, to facilitate urban regeneration.
20. NGP also supports the de-designation of the Clarendon Square site at Haringey Heartlands as Employment Land (previously included in Figure 5.1 'Employment Areas' in the May 2010 version of the Core Strategy and the adopted UDP) on the Core Strategy Defined Employment Areas map at the rear of the consultation document. It is also important to note that this is in accordance with emerging planning policy set out within the Draft London Plan and NGP considers that the Core Strategy Defined Employment Areas map at the rear of the consultation document should replace Figure 5.1 within the May 2010 version of the draft Core Strategy.
21. The Clarendon Square site is underused brownfield land and represents an inefficient use of the site. The proposals 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.

Drivers Jonas Deloitte.

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

A handwritten signature in black ink, appearing to read 'M. Taylor', written in a cursive style.

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