

27<sup>th</sup> March 2015

**Delivered by email**

Planning Policy  
6<sup>th</sup> Floor, River Park House  
225 High Road  
Wood Green  
N22 8HQ

Dear Sir/Madam,

## **SUBMISSION OF REPRESENTATIONS TO HARINGEY'S LOCAL PLAN PREFERRED OPTIONS: SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)**

The Berkeley Group has recently signed a Joint Venture agreement with National Grid and established a new subsidiary company, St. William to work on relevant sites. It therefore has potential involvement in Clarendon Gasworks as it moves forward.

On behalf of our Client St William, we hereby submit representations to the Preferred Option version of the 'Site Allocations Development Plan Document' (DPD), which was issued in February 2015. We would like to highlight that this is an interim representation and that we may submit further representations in due course.

### **Background**

#### **Haringey's Local Plan, Preferred Option: Site Allocations DPD**

##### SA 5: Clarendon Square

The Site Allocations DPD identifies Clarendon Square as an opportunistic site for significant development. This will not only aid in addressing Haringey's housing demand but will provide the opportunity to create spaces and jobs for employment and realise the potential for intensification from the introduction of Crossrail 2, which will stop at Alexandra Palace and Turnpike Lane, which are both close to the site. Whilst we support the allocation in principle, we consider that the site allocation specifications should be revised to ensure that they are accurate to ensure that the redevelopment potential of the site is optimised.

### ***Site Size***

The current allocation indicates that the site size is 4.55 Ha which would restrict and limit any future redevelopment of the site. We would like to highlight that the Outline Planning Consent for Clarendon

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Square covers 4.83 Ha and includes land and buildings owned by National Grid Property Holdings Limited (NPG) and the Greater London Authority (GLA). The site area is further identified in the Greater London Authority (GLA) report dated to 2011 and 2014 (PDU/0130/01, PDU/0130/02 and D&P/0130b/02) as being 4.83 Ha. Therefore, we consider that this figure should be revised to include all areas of the site which will enable developers to have sufficient flexibility in their approach to the redevelopment of Clarendon Square. Additionally, this will encourage a more comprehensive redevelopment of the site and allow for the provision of more housing, residential amenity and employment floorspace. We do not consider that the policy needs to restrict the site area and suggest that this should be appropriately amended to reflect the entirety of Clarendon Square.

### ***PTAL Rating***

We note that SA 5 indicates the site has a Public Transport Accessibility Level (PTAL) rating of 3. Where this may be the case in some areas of the site, the vast majority of Clarendon Square benefits from being highly accessible with an overall PTAL rating of 4, as stated in the GLA Reports. This assertion is also supported on the Transport for London website, which identifies PTAL ratings across London (<http://www.webptals.org.uk/>).

The site is in close proximity to both Wood Green and Turnpike Lane Underground Stations which serve the Piccadilly line and provides links to major rail stations such as King's Cross. Furthermore, the site benefits from being nearby both Alexandra Palace and Hornsey Rail Stations. It is also close to a number of bus routes.

The current PTAL rating specified for Clarendon Square (PTAL 3 is quoted) is not an accurate reflection of the site's accessibility levels. Furthermore, this rating should consider the emerging context of the area and the introduction of Crossrail stations at Turnpike Lane and Alexandra Palace, which will further increase the transport capacity of the site and Wood Green as a whole. We recommend that this rating be amended to accurately reflect the site's accessibility levels as well as the current transport proposals that will improve the public transport accessibility of the site in the future. In doing so, this will allow the site to benefit from higher housing density levels and will optimise its housing potential.

### ***Future Planning Requirements***

The site allocation identifies 'future planning requirements'. Should a revised planning application come forward we suggest that the text which refers to "Increase B1 / reduce or retain C3", should be amended to "Increase C3 / maintain or reduce B1". Specifically, this approach would recognise the relevant planning policy requirements within the London Plan and the emerging Haringey Local Plan. The site has been identified as a 'central' area by the council and this allocation will promote higher densities to optimise the development potential at the site. We consider that the current wording is overly restrictive and does not adhere to current and emerging policy guidance.

We also consider that the northern and western parts of the site could be appropriate for a tall building. Given the potential for a tall building at the site, we consider that the following bullet point should be added to the 'Future Planning Requirements' section of the Site Allocation as stated below:

- *"Provision of a taller building(s) at the north and north western sections of the site."*

## ***Other Planning Matters***

We consider that the site displays many characteristics of a 'central' setting rather than that of an 'urban' one. Policy 3.4 in The London Plan describes a 'central' setting as:

*'Central – Areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major Town Centre.'*

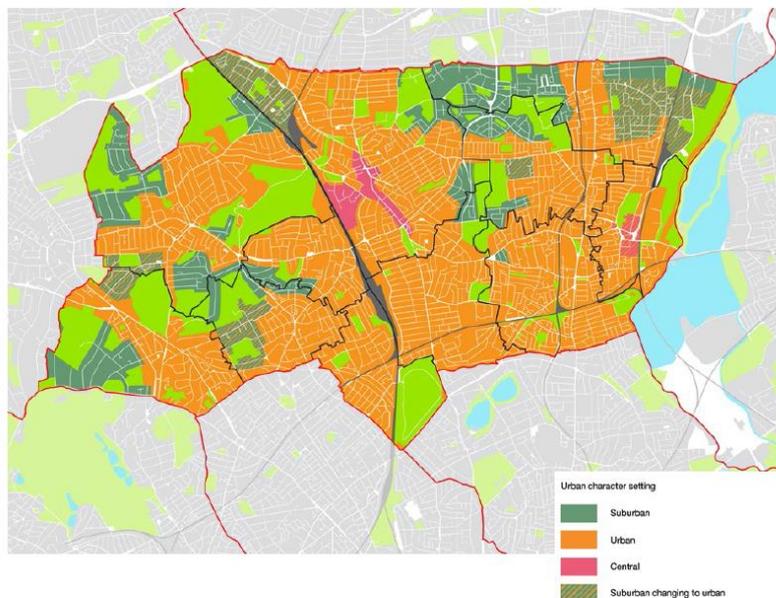
Wood Green is classified within the London Plan as a Metropolitan Centre and the boundary of this designation on the proposals map is adjacent to the site. The entire site is within 800 metres walking distance of Wood Green Metropolitan Town Centre. The site lends itself to many of the attributes of the characteristics of a Central setting and we consider that this should be revised to better reflect the local context of the area. The vast majority of the buildings to the north, north east, south and west of the site are four to six storeys in height (or above). Such schemes include New River Village to the West, the Chocolate Factory and Alexandra Park School to the north and Shopping City to the north east. This correct definition of the site as a 'central' location would enable the development potential of the site to be optimised as such a definition would permit residential density levels of up to 1,100 hrha in accordance with the London Plan. Such an approach would also assist Haringey Council in meeting its ambitious housing targets, which are now 1,502 residential units per annum, as noted in the London Plan. A map identifying buildings within the proximity of the site which have large building footprints of four or more storeys is provided at Appendix 1.

It should also be noted that our suggested approach is further supported by both the Urban Characterisation Study (see below for the relevant extract) and Map 2.1. 'Haringey Character Setting Map', within the Preferred Options of the Development Management Policies Document (DMPD) at p.7, which clearly identifies the site as a 'central' area.

## General recommendations

Eight

### Future Character Settings



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The London Plan and Mayor's Housing SPG sets out three character settings; suburban, urban and central, to help decisions on selecting appropriate density ranges in conjunction with PTAL and habitable room mix. This study has analysed the character setting across the borough and allocated one of these three settings.

The majority of the borough is considered 'urban' in character, with some suburban areas to the north and west. Wood Green is the only area considered central in character due to it being a metropolitan town centre. Some areas are currently suburban but have the potential to become more urban with intensification and development, these areas are also defined as 'suburban changing to urban'.

#### London Plan Density Matrix (habitable rooms and dwellings per hectare):

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
<b>Suburban</b>	<b>150-200 hr/ha</b>	<b>150-250 hr/ha</b>	<b>200-350 hr/ha</b>
3.8-4.6 hr/unit	35-55 u/ha	35-45 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
<b>Urban</b>	<b>150-250 hr/ha</b>	<b>200-450 hr/ha</b>	<b>200-700 hr/ha</b>
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
<b>Central</b>	<b>150-300 hr/ha</b>	<b>300-650 hr/ha</b>	<b>650-1100 hr/ha</b>
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	180-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha	215-405 u/ha

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- **central** – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 300 metres walking distance of an International, Metropolitan or Major town centre.
- **urban** – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes.
- **suburban** – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

Making the appropriate amendments to both the PTAL rating and setting of Haringey Heartlands is crucial to realising the optimum potential of the site. Further to this, Policy 2.13 in The London Plan identifies the wider area of Clarendon Square, Haringey Heartland/Wood Green, as being an Intensification Area. As a designated area, it has been recognised for its potential to support redevelopment at higher densities as well as having the capacity to accommodate new jobs and homes. By enabling the site to achieve higher densities, Clarendon Square and the wider Haringey Heartlands will be able to significantly aid the council in meeting its housing and employment targets within the London Plan.

## Summary

The borough is currently faced with a significant housing challenge and a large demand for housing across all tenures. With a finite source of land in Haringey, we consider the Haringey Heartlands area and Clarendon Square, as being suitable for tall buildings to support the delivery of housing and to make optimal use of the capacity of the site. As a response to the emerging context of the area and its increase in transport capacity, we believe that the provision of tall buildings can aid in meeting the regeneration and economic goals of Haringey and The London Plan. Wood Green has been identified as a suitable location for taller buildings and we consider that the northern section of Clarendon Square is appropriate for tall buildings in principle and should therefore be allocated as a tall building location to form a network of taller buildings in the area as well as a gateway to the Haringey Heartlands regeneration area.

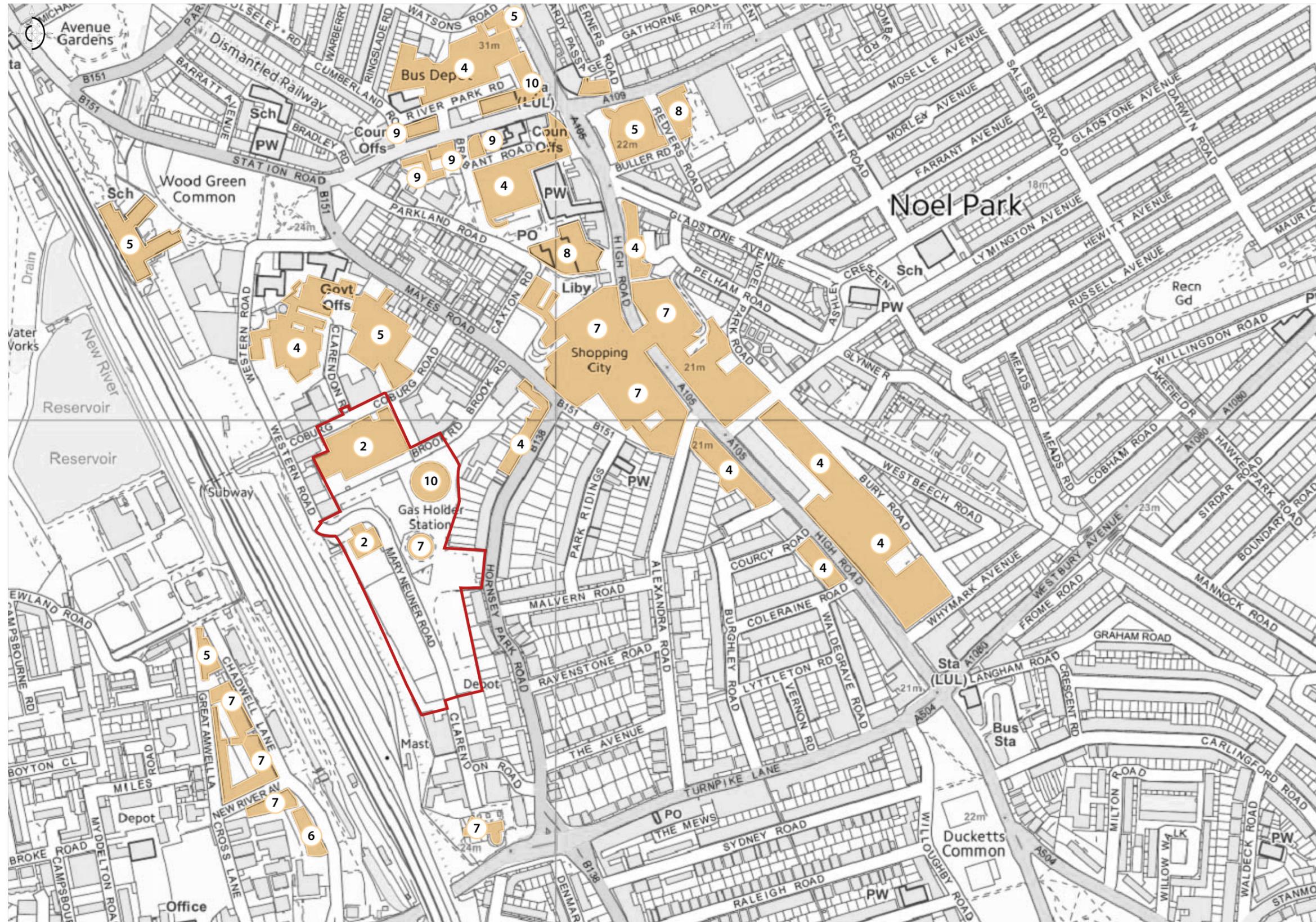
The suggested amendments made above will ensure the integrity for the future redevelopment of the site as granted. In addition, it will provide sufficient flexibility for the site in response to the emerging context of the area. Should you have any comments on these representations or wish to discuss them further please contact me on 020 7851 4025.

Yours Sincerely

Matt Humphreys  
**Associate Director**

## Appendix 1

# Map 1: Building heights and Large Building Footprints



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This drawing is for illustrative purposes only and should not be used for any construction or estimation purposes.

**DO NOT SCALE DRAWINGS**

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- Site boundary
- Large building footprint
- 10 Building height / equivalent height (storeys)



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Client:  
**St James**

Project:  
**Clarendon Square**

Drawing:  
**Building heights and large building footprints plan**

Scale: **1:5000@ A3**      Status: **Final Draft**

Project Number:  
**STJL3001**

Drawing Number:  
**02**

Date: **March 2015**      Revision: **00**