

St William



LAND AT HARINGEY HEARTLANDS, BETWEEN HORNSEY PARK ROAD, MAYES ROAD,
CLARENDON ROAD, AND THE KINGS CROSS/ EAST COAST MAINLINE
HARINGEY LOCAL PLAN REPRESENTATIONS
STRATEGIC POLICIES DPD, DEVELOPMENT MANAGEMENT DPD, SITE ALLOCATIONS DPD
4TH MARCH 2016

1.0 An Introduction to St William

- 1.1 National Grid plc ("National Grid") and The Berkeley Group Holdings plc ("Berkeley") have established a Joint Venture to develop major residential and mixed-use development schemes across London and the South East.
- 1.2 The partnership, named St William Homes LLP ("St William"), brings together access to a significant portfolio of brownfield land owned by National Grid Property in key areas of housing need with Berkeley's expertise to design, build and market new developments.
- 1.3 St William has the potential to provide over 7,000 homes in eight boroughs across Greater London. It will combine the design expertise of Berkeley with National Grid Property's portfolio of redundant brownfield sites to create some fantastic new places for people to live.
- 1.4 These sites will see 83 acres of land remediated and restored to play a positive, useful role in each community. The developments will offer a broad mix of housing and a wide range of tenures from social rented and shared ownership properties, to homes for first time buyers and families, accommodation for senior living, and private apartments.
- 1.5 As well as creating over 7,000 new homes, the developments will support over 5,500 new jobs and a total contribution of over £155 million to local infrastructure and amenities.
- 1.6 St William will develop the Clarendon Road Gas Works site and the Olympia Trading Estate ("Clarendon Gas Works"). The site area is 4.8 hectares.
- 1.7 St William welcomes the opportunity to work with the London Borough of Haringey as it undertakes a review of its Local Plan Strategic Policies, Development Management Policies and Site Allocation Policies.
- 1.8 The representations enclosed within this submission are made prior to the expiry of the consultation period on the 4th March 2016, and relate to the land interest at Clarendon Gas Works.

2.0 St William's Development Objectives

- 2.1 St William recognises the following ambitions of Haringey Council, and wishes to work with the authority to deliver their recognised objectives:-
 - An ambitious vision for Wood Green to meets its growth needs
 - The creation of its own "Innovation Economy" which is "fully-employed" to create a sustainable future for Haringey
 - Greater prosperity, independence, health, opportunity and achievement for Haringey residents
 - A desire to be at the forefront of delivery for London
 - Recognition that sustainable development needs will result in a step change approach to density of development and building heights within Wood Green
 - One single Crossrail 2 station at Wood Green to transform Wood Green
 - Demonstrating that Haringey and Wood Green is ready for the interest and investment that Crossrail 2 will attract
 - Wood Green is a recognised Central location; a Metropolitan Centre and is recognised as a future Mayor of London Opportunity Area. It has intrinsic qualities to accommodate future growth requirements.

- 2.2 It is St William's belief that a single Crossrail 2 station at Wood Green is the most appropriate option, and that St William's regeneration objectives can help justify this approach. The existing increase in homes and jobs suggest that Wood Green is the appropriate destination and draw for Crossrail 2, and that further capacity exists within this Central London location to support Crossrail 2.
- 2.3 St William wishes to be part of the solution to the inequality gap that exists within Haringey. It is recognised that median salaries are below neighbouring boroughs; that there is a life expectancy and good health gap; and that prosperity through employment will ultimately support health.
- 2.4 St William at Clarendon Gas Works can help address these issues by delivering the following:-
- Quality employment and training which can improve the skills gap and improve economic prosperity.
 - Economic prosperity can improve the health gap.
 - Economic prosperity and equality within Wood Green will need a large supply of housing of all sizes and tenures and a large supply of workspace to attract investment in future industries. This should include appropriate low cost enterprise floorspace.
 - The Council's housing target in Wood Green is a minimum of 6,000 units and 1,500 new jobs, which currently relies on a few larger sites and many small sites coming forward to realise deliver.
 - Clarendon Gas Works is the largest unfettered brownfield development site in Wood Green, free of land ownership issues, and with immediate development capacity.
 - The site benefits from an existing planning permission which was not conceived with the current growth targets in mind, and therefore it is not currently contributing its full potential to Haringey's development objectives.
 - It is considered that employment density could be increased at Clarendon Gas Works if accompanied and enabled by an increase in residential density.
 - There is a now or never opportunity to help meet Haringey's future needs at Clarendon Gas Works.
- 2.5 St William believe that employment, can lead to economic prosperity and health equality, accompanied and enabled by residential development and we wish to work with Haringey Council to realise this objective.

3.0 Clarendon Road Gas Works - The Extant Planning Permission

- 3.1 National Grid and the London Development Agency obtained outline planning permission (ref.HGY/2009/0503) on the 21st March 2012 for the following development:-

“Outline planning application for demolition of existing structures and redevelopment to provide a residential led, mixed-use development, comprising between 950 to 1,080 residential units (C3); with 460sqm to 700sqm of office uses (B1); 370sqm to 700sqm of retail/financial and professional services uses (A1/A2); 190sqm to 550sqm of restaurant/cafe/drinking establishment uses (A3/A4); 325sqm to 550sqm of community/assembly/leisure uses (D1/D2); new landscaping, public and private open space, and energy centre, two utility

compounds, up to 251 car parking spaces, cycle parking, access and other associated infrastructure works.”

- 3.2 The permission is subject to 71 planning conditions, a section 106 legal agreement and an Environmental Impact Assessment. This planning permission was approved prior to the current adopted Haringey Local Plan: Strategic Policies (March 2013) and the London Plan (March 2015).
- 3.3 The outline planning permission HGY/2009/0503 (approved on 21st March 2012) was subsequently amended by planning permission HGY/2013/2455 dated 7th April 2014, under section 73 of the Town and Country Planning Act to allow Site Preparation Works to take place including "demolition of the gas holders and remediation works and erection of the Pressure Reduction Stations".
- 3.4 This planning permission will be realised by the demolition of the gasholders and the submission of reserved matters. It therefore constitutes a baseline of development at this site comprising the following:-
- Up to 1,080 residential units (C3) 24.4% of which will be affordable (by habitable room)
 - Office uses (B1)
 - Retail/financial and professional services uses (A1/A2)
 - Restaurant/cafe/drinking establishment uses (A3/A4)
 - Community/assembly/leisure uses (D1/D2)
 - 251 car parking spaces and 60 disabled spaces
 - Buildings up to 10 storeys in height
- 3.5 There is however a window of opportunity to consider an alternative masterplan for the site to help achieve the growth objectives set by Haringey for Wood Green.

4.0 Clarendon Road Gas Works – An Alternative Masterplan

- 4.1 St William now benefits from a planning permission for redevelopment of Clarendon Gas Works which is an important baseline, and is a permission that St William can technically develop out.
- 4.2 However, since the original grant of planning permission in March 2012, Haringey have adopted their Local Plan (2013), which is now under review. The new London Plan (2015) has also been adopted and in addition, Haringey are out to consultation on their new Area Action Plan for Wood Green.
- 4.3 There is therefore adopted and emerging development plan policy in existence which the original permission does not relate to, which seeks to deliver new substantially increased levels of sustainable development and infrastructure to meet the needs of the Borough and Wood Green.
- 4.4 St William consider that it is appropriate, at this juncture, to seriously consider whether Clarendon Gas Works, in conjunction with adjacent sites, can assist in meeting these greatly increased housing and employment targets through an alternative masterplan whilst delivering new opportunities and benefits to the local community. This would include a design review and as well as a review of non-residential floorspace across the site, recognising the economic benefits that regeneration can deliver set out above.
- 4.5 Clarendon Gas Works represents a now or never opportunity for Haringey and Wood Green. It is an available, brownfield site without land ownership complexity and with significant development capacity.

There is an opportunity to increase employment density at Clarendon Gas Works to meet Haringey's new objectives if this is accompanied and enabled by an increase in residential density.

- 4.6 Haringey's housing requirements for example has recently increased from 820 homes per annum to 1,502 homes per annum – an 83% increase. Wood Green has also been identified as a possible location for a new Crossrail 2 station, and the Mayor of London has committed to consider Wood Green as an Opportunity Area. The London Plan forecasts 12,000 additional jobs in the Borough over the period 2011 – 2026, and over the period 2011 – 2036, it forecasts an additional 22,000 jobs in Haringey. This represents a 29.5% increase in jobs, the highest projected employment growth rate of all London boroughs.
- 4.7 St William considers that there is an opportunity to review the masterplan for Clarendon Gas Works, to determine if an alternative approach can help deliver the strategic development plan objectives for Haringey in a viable and appropriate manner whilst taking cognisance of the current planning permission.
- 4.8 As part of this review, it is considered appropriate to work with Haringey Council to help inform the Local Plan review, and any other relevant planning policy for the site.
- 4.9 An overarching theme of this submission is the step change required to be undertaken by Haringey in meeting its new London Plan housing and employment targets and the emerging objectives established by the Wood Green AAP.
- 4.10 We are concerned that these new objectives do not necessarily chime with the draft approach to tall buildings and residential density currently undertaken by the Pre-Submission Local Plan and suggest that this is rectified. We are also keen to ensure that the Local Plan documents are consulted upon, and processed, in a coherent and comprehensive manner. We note for example that the Wood Green AAP will be a Development Plan Document (DPD) which will make up the Local Plan. The AAP will sit below the Strategic Policies DPD, but once adopted the AAP site allocations and area specific policies will supersede the allocations in the Site Allocations DPD and policies within the Development Management DPD. The emerging objectives of the Wood Green AAP need to inform the Local Plan review.
- 4.11 We set out our comments below.

5.0 Haringey Alterations to Strategic Policies 2011-2026 Pre-Submission Version January 2016

- 5.1 **Chapter 01 Introduction** - We recognise that the release of 2011 Census data, which set out higher than previously projected population growth figures for London, has resulted in the Mayor of London adopting Further Alterations to the London Plan (FALP).
- 5.2 This has significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum, effective from April 2015 – an 83% increase. This increase requires a review of housing delivery in the borough, and a clear need to maximise development opportunities in appropriate locations.
- 5.3 **Policy SP1 Managing Growth** We welcome the continued role of Haringey Heartlands and Wood Green as a Growth Area and the requirement to maximise site opportunities in these locations. We support the inclusion of Clarendon Gas Works within this Growth Area.
- 5.4 **Policy SP1 Managing Growth Table 2: Broad Distribution of New Housing** We note that Haringey Heartlands and Wood Green Metropolitan Centre are identified for housing delivery of 4,595 homes up

to 2025 (previously the target was 1,720). The Wood Green AAP Issues and Options Document (2016) Option Four (The favoured option of the Council) promotes a minimum of 6,000 new homes for a comparatively similar area (albeit the boundary areas are different). We consider that it would be prudent for the strategic housing targets to correlate to the Wood Green favoured option.

- 5.5 **Policy SP2 Housing** We note that the policy reduces a borough wide affordable housing requirement from 50% to 40% due to the Haringey Development Appraisals & Viability Testing January 2015, and would maintain that this borough wide target is tested through viability modelling for each application site.
- 5.6 **Policy SP2 Housing** We note that the affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing is now proposed in line with the London Plan.
- 5.7 **Policy SP2 Housing Supporting Paragraph 3.2.7** now includes reference to the Haringey Urban Characterisation Study (2014). The evidence base for the Local Plan refers to a 2015 document. The Study provides useful urban design analysis, but will ultimately be superseded, in part, by the Wood Green AAP, and therefore we question the appropriateness of the reference. The 2015 document is also out of date in terms of its reference to Clarendon Gas Works.
- 5.8 **Policy SP8 Employment** We note that Wood Green Local Employment Area is a Regeneration Area which is the most flexible of the categories as it can include mixed use development such as small scale “walk to” retail, community and residential uses. This is supported.
- 5.9 **Policy SP8 Employment Supporting Paragraph 5.1.18** We note that the London Plan (2015) sets out revised employment projections for Haringey. The London Plan forecasts 12,000 additional jobs in the Borough over the period 2011 – 2026. Over the period 2011 – 2036, it forecasts an additional 22,000 jobs in Haringey. This represents a 29.5% increase in jobs. St William aims to meet sustainable economic needs where it develops and considers Clarendon Gas Works a site where it can assist Haringey Council in contributing to its London Plan objectives.
- 6.0 Haringey Site Allocations DPD Pre-Submission Version January 2016**
- 6.1 **Policy SA1. Indicative Crossrail 2 Areas and Figure 1.3 Indicative Crossrail 2 Areas** excludes reference to the “Option Via Wood Green” Crossrail 2 option (Autumn 2015). This option should be included, and is an option that St William support.
- 6.2 **SA3. Changes to Town Centre Boundaries; Figure 1.5 Haringey District and Local Centre Boundaries; and Figure 1.8 Wood Green Metropolitan Centre** excludes Clarendon Gas Works. Given the permitted uses to the north of the site, and the emerging objectives of the Wood Green AAP, it may be prudent to extend the Wood Green Metropolitan Boundary to cover the north of the Clarendon Gas Works. Site allocation SA21: Clarendon Square Gateway directly to the east, for example, is included in the allocation.
- 6.3 **Figure 2.3 Wood Green Tall Buildings Paragraph 2.10 – 2.12** The identification of Wood Green as a Tall Building Growth Area and a location for tall buildings is supported. St William agrees that high rise buildings will mark the area as a location for people to visit, invest in, and navigate around. These urban regeneration objectives has been identified by CABI and English Heritage. Whilst paragraph 2.11 includes reference to “Penstock foot tunnel” as a suitable location for tall buildings “signalling the connection between Wood Green and Alexandra Park” we believe that this reference should include Clarendon Gas Works and be expanded to reference wayfinding to a new urban (employment). Tall buildings are defined in the Strategic Policies Local Plan as being buildings 10 storeys and over. Given the recent planning permission at Clarendon Gas Works we would expect this site to be referenced at Paragraph 2.11 certainly

as the Haringey Potential Tall Buildings Locations Validation Study (2015) confirms that tall buildings up to 10 storeys high (permission granted 21/03/12) have been approved at this site. It should also be noted that the Issues and Options Wood Green AAP states that “The redundant gasholders on the Clarendon Road development site are also highly visible, and their removal may emphasise the need for a landmark or significant building in this location as a wayfinding device”. Finally the Haringey Urban Character Study refers to the existing scale of the Gasholders as one of only 11 buildings in the borough of 39m (13 storeys) plus, and therefore the existing site contains defined tall buildings. Reference to Tall Buildings at Clarendon Gas Works appears an incorrect omission.

- 6.4 **The Western Heartlands Area Clarendon Square Paragraph 2.19 to 2.21** The spirit of the text at Paragraph 2.19 to 2.21 is supported however the factual discrepancies need to be amended – 2012 not 2011 and 10 storeys not 9 storeys. St William support the consideration that “It may be possible to add a tall buildings cluster at the junction of Western and Coburg Roads to mark the entrance to Wood Green from Alexandra Park and the west of the Borough” and would like to work with the Council to consider this detail further in respect of Clarendon Gas Works.
- 6.5 **Allocation SA21: Clarendon Square Gateway** St William supports the redevelopment of this site as part of Wood Green Metropolitan Town Centre so long as it delivers the fundamental role of creating a new extended High Street to Wood Green and a gateway to Clarendon Road Gasworks. The site should importantly compliment site SA22.
- 6.6 **Allocation SA22: Clarendon Square** St William support the mixed use proposed site allocation, and reference to the extant planning permission. Given the scope to consider an alternative masterplan at this site, as previously discussed in these representations, it is considered that the site allocation be appropriately refreshed to ensure a deliverable alternative to the extant permission. St William support the proposed allocation of “residential, employment, a new urban square, and improved linkages through the area” however question the inclusion of “education uses”. There is no evidence base to suggest that this use should be accommodated at this site, and therefore education use should be removed from the proposed site allocation.
- 6.7 We do consider that the allocation should refer to the provision of tall buildings on site, certainly in light of the scale of the existing gasholder, the extant permission for tall buildings, Paragraph 2.21 reference to the tall buildings cluster at the junction of Western and Coburg Roads, and the commentary within the Issues and Options Wood Green AAP. It should be noted that the consented building heights for the majority of the site are significantly above those recommended at Page 156 of the 2015 Urban Character Study.
- 6.8 In respect of the ‘Site Requirements’ Allocation SA22 states that development proposals will be required to be accompanied by a site wide masterplan showing how the land included meets the allocation policy and does not compromise co-ordinated development on the other land parcels within the Allocation. We accept that any future masterplan will need to be considered holistically both for this site, and adjacent sites, however we would not expect a separate masterplan to be adopted as a policy/planning brief, particularly given this allocation and the emerging AAP.
- 6.9 We consider that the extension of the Metropolitan Town Centre boundary along the northern edge of the site may be of benefit to deliver the objectives of bringing forward town centre uses in this location, and tying the site into Allocation SA21 Clarendon Square Gateway adjacent. We are not convinced that the “straightening” of the “existing kinks in Clarendon Road/Mary Neuner Way” is necessary either in urban design or highway design terms, and it seems an unnecessary requirement which the extant permission does not deliver. This element should be deleted.

- 6.10 Finally it is considered that this site comprises a Central location for the purposes of London Plan Table 3.2. Policy 3.4 of the London Plan requires development to optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the London Plan. Wood Green is defined as only one of a handful of Metropolitan Boroughs within London and is a Central location, namely an area 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 a Metropolitan town centre (Notes to Table 3.2). Clarendon Road Gas Works benefits from a current PTAL of 3-4 within this Central location, albeit this will increase with the arrival of Crossrail 2. The London Plan Table 3.2 would support a density range up to 1100hr/ha or 405u/ha in such locations subject to local context. We consider that this classification should be confirmed to cover the Clarendon Gas Works site.
- 6.11 **SA24: NW of Clarendon Square** lies adjacent to Olympia Trading Estate. It is located within a Local Employment Area: Wood Green Regeneration Area (unlike Clarendon Gas Works). The site allocation seeks “new high density employment-led mixed use development with residential”. In addition “Capped commercial rents will be expected in this area in line with the Policy DM38” and the “The maximum quantum of employment floorspace feasible should be provided on this site.” The development guidelines recognise that the site is “identified as potentially suitable for a tall building” as part of the Coburg/Western Roads tall building cluster. St William supports this allocation. Should this site be included within the wider redevelopment of SA22, then it should be recognised that the land use objectives for this site could be consumed within the wider masterplan and visa versa.

7.0 Haringey Development Management DPD Pre-Submission Version January 2016

- 7.1 **Chapter 02: Policy DM5: Locally Significant Views and Vistas illustrated by Figure 2.1 Haringey Views (as below) and Appendix A Table 2 Schedule of Locally Significant Views** seeks protection of local views across the borough. The basis of these views arises from the 1998 UDP and 2014 Urban Characterisation Study (assumed to be the 2015 Study).



- 7.2 Figure 2.1 does not correspond to the indexation of Appendix A and should be rectified, moreover, the viewpoints are not clearly cross referenced with the Urban Character Study (UCS) (2015) and the Tall Buildings Locations Validation Study (2015) to define the relevance and weighting of the viewpoints which should be addressed.

- 7.3 We are concerned that the requirements of the policy may result in inevitable conflict with the development plan policy objectives for the Growth Area and therefore may not be technically 'effective'. As currently drafted the policy may fail for Wood Green.
- 7.4 Haringey Council are planning to support a minimum of 6,000 new homes in Wood Green and a significant increase in employment generating floorspace. Clarendon Gas Works has permission for tall buildings, is part of the tall buildings cluster at the junction of Western and Coburg Roads, and lies adjacent to current tall building allocations. The Issue and Options Wood Green AAP confirms that "The redundant gasholders on the Clarendon Road development site are also highly visible, and their removal may emphasise the need for a landmark or significant building in this location as a wayfinding device".
- 7.5 This approach needs to be balanced with the converging Locally Significant Linear Views (No.19, 20, 21, and 22) which cross the Wood Green Growth Area and Wood Green & Haringey Tall Building Area to Alexandra Palace. The Potential Tall Buildings Validation Study 2015 recognises that "There is potential for any development of tall buildings at this location (Wood Green and Heartlands) to be visible from several sensitive receptors, which will need to be considered in further detail". The Study also refers to a "height limit" within the Growth Area, which St William has concerns about, albeit the report does not recommend what this might be, or how it might be assessed. We would be concerned if proposed height limitations arose out of non-development plan documents.
- 7.6 Policy DM5 (Part A (a-c)) requires proposals in the viewing corridors of the Locally Significant Views to demonstrate how the proposal enhances the viewers' ability to recognise and appreciate the landmark being viewed; makes a positive contribution to the composition of the local view; and meet the requirement of the Council's Tall Buildings and Views Supplementary Planning Document (which does not yet exist). It is considered that requirements (a-c) are too onerous for key development sites in Wood Green and will not be effective, considering other development plan policies which promote development within these viewing corridors. We do not consider this wording to be effective, and it should be removed or reworded.
- 7.7 **Chapter 02: Policy DM6: Building Heights** For the reasons explained for Policy DM5, we have concerns regarding Part B(b) of this policy. Part C(c) of the Policy also refers to Council's Tall Buildings and Views Supplementary Planning Document which has not yet been issued for comment and therefore it is inappropriate to consider it formally within this consultation as we cannot comment on its acceptability.
- 8.0 Chapter 03: Policy DM11: Housing Mix.**
- 8.1 Part A (a) of the policy should include reference to the viability of the development in accordance with the NPPF and NPPG.
- 8.2 Part A (b) requires the target mix for affordable housing, in accordance with Policies SP2 and DM13, and the Council's Housing Strategy which itself is in draft and has been out to consultation.
- 8.3 Part B confirms that "The Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach (see Policies DM1 and DM2), also having regard to the findings of the Haringey Urban Characterisation Study (2015)".
- 8.4 We consider the first component of Part B to be unnecessary owing to Policy SP2, and do not consider that the Haringey Urban Characterisation Study should inform "the optimum housing potential of a site". Page 156 of the 2015 Urban Character Study Building Height Recommendations suggests, for example,

buildings heights of 3 to 6 storeys across the Clarendon Gas Works site. This despite it being an allocated Central site for Density Purposes (see page 240 of the 2015 Urban Character Study); the majority of the rest of the Borough being an urban, suburban or greenfield location; and the growth requirements of the London Plan. 3 to 6 storeys would be an underutilisation of this site, and in any event would not reflect the extant planning permission which is principally for 7 to 9 storeys. We consider that Part B should be deleted.

8.5 We retain the right to add to, or amend this submission.

End