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Dear Sir / Madam,

Haringey's Local Plan – Preferred Option Site Allocations DPD National Grid Representations

We write on behalf of National Grid Property (National Grid) in respect of the Haringey Local Plan, Site Allocations DPD which was recently published for public consultation.

National Grid are owners of the decommissioned gas holders site at Haringey Heartlands, land bounded by Hornsey Park Road, Mayes Road, Clarendon Road and the Kings Cross Mainline (the Site). The Site is subject to an extant planning permission for a residential led mixed use development which includes all of the National Grid land and the land immediately to the north which is owned by the Greater London Authority (GLA).

We hereby submit representations on behalf of National Grid in respect of the Site.

National Grid are in early discussions with St William regarding the inclusion of the site within the Joint Venture agreement which was recently announced. Due to their potential future involvement in the site, it is understood that St William have submitted separate representations to the Site Allocations DPD. National Grid are supportive of these representations and the following comments should be read in conjunction with the comments made by St William.

Site and Background

Following changes to how gas is stored in the UK, the Site has been decommissioned for gas storage and the gas holders on the Site are currently redundant.

Since 2004 discussions have been held with the London Borough of Haringey (LBH) regarding the future use of the Site now it is no longer required for the storage of gas.

Following detailed discussions with LBH, National Grid secured outline planning permission for the dismantling of the existing gas holders and the redevelopment of the site in 2012 (App No. HGY/2009/0503). The planning permission approved 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 460 sqm to 700 sqm of office uses (B1); 370 sqm to 700 sqm of retail/financial and professional services uses (A1/A2); 190 sqm to 550 sqm of restaurant/café/drinking establishment uses (A3/A4); 325 sqm to 550 sqm 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, access and other associated infrastructure works.”

The application remains extant subject to the submission of reserved matters.

In 2014, a minor material amendment (S73) application was granted planning permission (HGY/2013/2455). This permission allowed the demolition of the existing structures on the site, with the exception of the Olympia Trading Estate, in advance of the submission of reserved matters.

It is National Grid's intention to work in partnership with a developer (possibly St William), which will bring forward the redevelopment following the demolition of the gas holders.

Representations - Site Allocation SA 5: Clarendon Square

The Site is allocated within the preferred options Site Allocations DPD under allocation SA5: Clarendon Square. The allocation forms part of the wider Wood Green Metropolitan Town Centre which includes Turnpike Land and the 'western heartland' within which the Site lies.

Wood Green is identified as a 'significant strategic asset' and part of the Haringey Heartlands / Wood Green Intensification Area. In addition, it is acknowledged that the area could become an Opportunity Area in the future.

Due to its location in relation to Wood Green, the Site plays an important role in the vision for the area, whether this be through the delivery of the existing planning permission or through a revised scheme.

The draft allocation identifies the Site's opportunity for redevelopment, although the allocation does not fully recognising the potential to optimise development. For the following reasons, National Grid consider that the allocation should be amended to ensure that the full potential of the site is realised.

Future Planning Requirements

The site allocation sets out a number of 'future planning requirements' should a revised application come forward. National Grid propose that these requirements are amended as follows.

“Increase B1 / reduce or retain C3”

The current planning permission on the Site approves a maximum of 1,080 residential units which provides a density of between 640 – 700 habitable rooms per hectare (hrha). This density was considered to be within the density matrix contained within the London Plan and as such was considered acceptable by LBH in their Report to Planning Committee in 2012.

The London Plan density matrix has not altered since planning permission was granted, although the London Plan and other planning policy such as the National Planning Policy Framework now place increased emphasis on optimising the potential of brownfield land to meet development needs. Specifically, the recently published Further Alternations to the London Plan 2015 (FALP) at paragraph 3.19 highlights the potential for excess industrial land to accommodate development and in particular high density development in areas with good public transport accessibility.

Furthermore, the FALP places greater emphasis on the delivery of increased housing across London. In particular, Policy 3.3 requires boroughs to identify opportunities for additional housing capacity to close the gap between identified needs and supply. As acknowledged in the introduction to the Site Allocations DPD, the FALP increases the minimum annual housing target in Haringey from 820 homes per annum to 1502 homes per annum,

Given that the Site sits within the Haringey Heartlands / Wood Green Intensification Area, there is even more expectation that the most should be made of development opportunities. This is confirmed at paragraph 2.61 of the FALP, which now states that:

“The Mayor expects [Opportunity Areas and Intensification Areas] to make particularly significant contributions towards meeting London’s Housing needs .”

In this context, National Grid strongly oppose the proposed future planning requirement to ‘reduce’ residential development on the Site.

Instead, we suggest that the words “reduce or retain C3” should be deleted and replaced by a new bullet point in the future planning requirements which states:

“Increase C3”

“Straighten the existing kink in Clarendon Rd / Mary Neuner Road”

Mary Neuner Road links Western Road and Clarendon Road and was built in 2008 to ease congestion on Hornsey Park Road. As such, the extant planning permission on the Site has been designed around Mary Neuner Road and takes into account the roads current footprint.

In particular, the existing kink within the road allows for the development of a new civic space, ‘Clarendon Square,’ in the north part of the site. Clarendon Square has been designed to be a primary pedestrian route through the Site and creates the opportunity for a new civic space which is car free.

Whilst it is acknowledged that the straightening of Mary Neuner Road would have associated benefits, a further design analysis would be required to assess the potential against the existing proposals.

Therefore, it is considered that this requirement should be amended to provided flexibility. We suggest the following amended wording:

“Potential to straighten the existing kink in Clarendon Road / Mary Neuner Way.”

Additional Future Requirement – Tall Buildings

The future planning requirements seek to establish Clarendon Square to the north of the Site as ‘a *destination*’ which complements Wood Green. This is supported in principle by National Grid.

Site allocation SA 29: L/a Coronation Sidings within the DPD identifies the site to the north west of SA 5. This site is identified as an opportunity for a mixed use development, including a landmark building marking the entrance to Wood Green from Alexandra Palace. The allocation goes on to state that a building of 12 storeys could be accommodated.

On this basis, it is considered that Clarendon Square, as a destination and key linkage to Alexandra Palace could accommodate tall buildings to emphasise the new square and act as landmarks within the east / west link.

We consider that the following wording should be included within the future planning requirements for the site:

“Provision of tall buildings to the north of the site in conjunction with Clarendon Square.”

Additional Future Requirement – Gas Infrastructure

The existing planning permission on the site includes the provision of two ‘utility compounds’ which would be used for the housing of gas infrastructure. Specifically, following the removal of the gas holders, there is still a requirement for National Grid to retain some gas infrastructure on the Site in the form of two Pressure Reduction Stations (PRS).

PRS are essential pieces of gas infrastructure which are required for the continued provision of gas for homes within Haringey.

It is considered that this requirement should be acknowledged within the site allocation. We suggest the following wording:

“Provision of necessary gas infrastructure.”

Site Area

Site allocation SA 5 states that the Site is 4.55 hectares which is incorrect. The site area of the outline planning permission is 4.83 hectares. The site allocation should be amended to reflect this.

PTAL Rating

The site allocation SA 5 states that the PTAL rating for the Site is 3. It is correct that part of the Site is identified as having a PTAL rating of 3, however a significant proportion of the site has a PTAL rating of 4.

This was discussed in the LBH report to Planning Committee in 2012 and was a consideration in determining the appropriate density for the Site.

The site allocation should be amended to reflect this range of PTAL levels across the site to ensure that the residential density is maximised in accordance with the London Plan density matrix.

We suggest that the PTAL rating is changed to ‘3 / 4’ within SA 5.

Conclusion

The Site has strong potential to deliver a large number of homes as is demonstrated by the extant planning permission. The current scheme establishes a precedent for a high density residential led mixed use development which accords with London Plan and local planning policy.

Should a revised planning application for the Site be brought forward the site allocation should reflect the potential to optimise the redevelopment of this significant brownfield site. As currently drafted, the allocation is inconsistent with wider policy aims to increase residential densities in order to meet London's housing needs.

On this basis, we propose a set of changes to emphasise the Site's potential for high density residential-led regeneration.

Should you require any further information or wish to discuss further please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads "Leonie Oliva".

Leonie Oliva
Deloitte LLP