

St William



CGW, HARINGEY HEARTLANDS, WOOD GREEN
REGULATION 18 WOOD GREEN APP PREFERRED OPTION
APRIL 2017

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, known as CGW ("CGW"). The site area is 4.8 hectares. This land may in the future include land at the junction of Western Road and Coburg Road which would extend the site area.
- 1.7 St William welcomes the opportunity to work with the London Borough of Haringey ("Haringey") as it undertakes consultation on its Wood Green AAP Preferred Option (the "AAP"). St William has already made representations to the Issues and Options Document (2016) and Haringey's Local Plan Review Strategic Policies, Development Management Policies and Site Allocation Policies (2016) and this submission reflects St William's strategic approach to Haringey's growth aspirations.
- 1.8 The representations enclosed within this submission are made prior to the expiry of the consultation period on 28th April 2017.

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 the following recognised objectives for Wood Green:-
 - An ambitious vision for Wood Green to meet its significant 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 Wood Green residents.
 - A desire to be at the forefront of delivery for London, with Wood Green representing the borough's principle town centre and one of only 13 Metropolitan Centres across London.
 - Working with the GLA to deliver an appropriate AAP for Wood Green.

- Recognition that sustainable development needs will result in a step change approach to residential density and building heights within Wood Green, reflecting this Central Location with high PTAL levels.
- Demonstrating that Haringey and Wood Green is ready for the investment that Crossrail 2 will attract.
- Wood Green is identified as a Borough Growth Area; Central location; a Metropolitan Centre; part of a Mayor of London Area of Intensification and a future Opportunity Area (within the 2020 London Plan). It benefits from intrinsic qualities which support future growth.

2.2 It is St William's belief that Wood Green is the most appropriate location for growth as the borough's only Metropolitan Centre. St William believe that significant capacity exists within this Central London location to accommodate levels of growth which exceed the minimum requirements to meet current and future requirements. CGW is a suitable, viable and available brownfield site which can meet this existing need.

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 Wood Green can help address these issues by delivering the following:-

- Delivering on site quality commercial floorspace and training to improve the skills gap and improve economic prosperity within Wood Green.
- More commercial floorspace to help Haringey meet its proposed increased from 1,500+ new jobs and 57,000m² of floorspace (Issues and Options AAP 2016) to 4,000 new jobs and 173,702m² of floorspace (Preferred Option AAP).
- Increasing employment densities only if they are accompanied and enabled by an increase in residential density.
- The extant planning permission for Clarendon Gasworks proposes up to 700m² of Class B1 floorspace and 70-130 jobs. There is a strong appetite to exceed this.
- Delivering residential densities identified in Table 3.2 of the London Plan to reflect Wood Green's PTAL 4-6 Central character location, and to help fund the increased levels of commercial floorspace and appropriate low cost enterprise floorspace.
- More housing to meet Haringey's increased residential target from a minimum of 6,000 units (Issues and Options AAP 2016) to 7,701 new homes (Preferred Option AAP). This relies upon few larger sites and many smaller sites coming forward which will have inherent deliverability issues. CGW is the largest unfettered brownfield development site in Wood Green. It is free of land ownership issues and has immediate development capacity. This substantial site can help Haringey meet its growth ambitions, and indeed, is fundamental to it. It will be a catalyst for growth.
- Recognising CGW as an existing location of tall buildings and comprising part of the Western and Coburg Road Tall Building cluster.
- There exists a now or never opportunity to help meet Haringey's future needs at CGW.

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 through the Wood Green AAP.

- 2.6 As CGW benefits from a planning permission which has been implemented and which was not conceived with the current growth targets in mind, it is considered that CGW is not currently contributing its full potential to Wood Green's development objectives.
- 2.7 However to achieve this development capacity, the emerging policy should not place unrealistic and/or unviable policy burdens onto the site which would prevent an alternative approach coming forward.
- 2.8 Paragraph 173 of the National Planning Policy Framework must be considered intrinsic to the formation of policy within the AAP, and in particular to each development site.

“173. Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.

- 2.9 We are concerned that the requirements of the policy are not being taken on board.

3.0 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). It was approved prior to the new growth objectives proposed by the AAP.
- 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", and by s.73 planning permission reference HGY/2016/0026, dated 23rd May 2016 which sought variations to certain conditions to ensure deliverability of the permission.
- 3.4 This planning permission has been implemented through the demolition of the gasholders and the approval of reserved matters (application ref HGY/2016/1661 dated 12th July 2016).

- 3.5 The extant permission comprises the following:-
- Demolition of the 42m (14 storeys) gasholders
 - Up to 1,080 residential units (C3) 24.4% of which will be affordable (by habitable room)
 - 460sqm to 700sqm Office uses (B1)
 - 370sqm to 700sqm Retail/financial and professional services uses (A1/A2)
 - 190sqm to 550sqm Restaurant/cafe/drinking establishment uses (A3/A4)
 - 325sqm to 550sqm Community/assembly/leisure uses (D1/D2)
 - Up to 251 car parking spaces including 60 disabled spaces
 - Buildings up to 10 storeys in height
 - Between 70 – 135 new jobs
 - No CIL liability
- 3.6 The extant planning permission constitutes a baseline of development and a land value that any future alternative masterplan must surpass to ensure that it constitutes a viable and deliverable form of development.
- 3.7 The extant planning permission constitutes a “realistic alternative” for the purposes of the test of soundness at Paragraph 182 of the National Planning Policy Framework.
- 3.8 Any new development plan proposal for the St William site must therefore have cognisance of the extant planning permission for the site to be considered sound, and ensure that paragraph 173 of the NPPF has been considered to avoid placing undue burdens on future development which would render delivery unviable.
- 3.9 This includes the consideration of the Community Infrastructure Levy, which was not applicable to the extant planning permission, but would be applicable to any new development plan proposal.
- “175. Where practical, Community Infrastructure Levy charges should be worked up and tested alongside the Local Plan. The Community Infrastructure Levy should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place”.**
- 3.10 Paragraph 175 of the NPPF confirms that CIL should be tested and worked up alongside the Local Plan. Haringey CIL was adopted on 1st November 2014, and levies a charge of £165 (excluding indexation) for residential uses (and £35 for Mayoral CIL). The impact that CIL will have on St William’s ability to deliver the emerging policy objectives is a material consideration which should inform Paragraph 175 and Paragraph 182 NPPF tests.
- 4.0 **An Alternative Masterplan**
- 4.1 The extant planning permission for the site was submitted in 2009 and originally approved in March 2012 (with revisions subsequent to this). Haringey Council adopted their Local Plan in 2013. This plan was subject to review in 2015/2016 and a new Local Plan is expected for adoption in 2017. The new London Plan (2016) has also been adopted and in addition, Haringey are consulting on the new Area Action Plan for Wood Green.

- 4.2 There is therefore adopted and emerging development plan policy which the original planning permission for CGW does not relate to, and has been superseded by.
- 4.3 It has been agreed with Haringey that the Local Plan Site Allocation DPD: Site SA22 Clarendon Square for CGW, should reflect the appropriate density levels for the site, and will include the following site specific text:-
- “Along with other site allocations in this document the site allocation for this site is a reflection of the extant planning permission. Whilst any new planning application would have to be subject to development control considerations and be determined on its own merits, and in particular the impacts on local View 21 of Alexandra Palace from Downhills Park Road will need to be taken into account, the PTAL accessibility of this site (now confirmed to be PTAL 4-6) and its Central character setting applying Table 3.2 of the London Plan Density Matrix could mean that the site could support increased scale and densities beyond that already approved, subject to the ability to achieve an acceptable overall land use mix.”**
- 4.4 All of the new policy documents seek to deliver substantially increased levels of sustainable development and infrastructure to meet the needs of the Borough and Wood Green.
- 4.5 Haringey’s housing requirements for example has recently increased from 820 homes per annum to 1,502 homes per annum – an 83% increase. 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.
- 4.6 St William took the decision in 2016 that it would consider a review of the extant planning permission for the site and whether an alternative masterplan could be feasibly delivered.
- 4.7 St William recognised that an alternative masterplan could 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 a review of the non-residential floorspace across the site, recognising the economic benefits that regeneration can deliver.
- 4.8 St William therefore entered into detailed pre-application discussions with the local community and Haringey. This culminated in a first public exhibition of the alternative masterplan during the week of the 20th February 2017, with a view to the submission of a new hybrid planning application in Summer 2017.
- 4.9 We are therefore able to consider both the extant planning permission and the emerging alternative masterplan, as discussed with Haringey, against the proposed policies within the Regulation 18 Preferred Option AAP 2017.
- 5.0 **Strategic Considerations**
- 5.1 We are concerned that some of the new policy objectives do not chime with the progress made towards the alternative masterplan; the practical realities of delivering an alternative masterplan; are not deliverable; and place a scale of obligations and policy burdens which if they could be developed would threaten the viability of the proposal.

- 5.2 Any new policy led approach within the AAP must exceed the “baseline” value of the Site and the development capacity of the already implemented planning permission HGY/2016/0026, dated 23rd May 2016. If it does not then it cannot be considered a deliverable proposition and will fall foul of paragraph 173 and 182 of the National Planning Policy Framework (“NPPF”), namely that the policy approach is not justified as it has not been considered against the reasonable alternative of the extant permission; and that it is not an effective policy, as it is not deliverable over the relevant period as no reasonable party would or could deliver the policy due to the excessive burdens placed on the developer.
- 5.3 It is considered that the proposed policy within the Regulation 18 AAP does not, in part, meet Paragraph 173 and 182 NPPF tests and therefore require revision. These are summarised below:-
- The step change in employment floorspace requirements within Wood Green are disproportionately greater than the increase in residential numbers.
 - Site Allocation WGS18 Clarendon Road proposes 14,091m² of commercial floorspace for the site and 7,046m² of town centre uses (total 21,137m²). This is 13 times that permitted within the extant planning permission. The site, as a matter of fact, does not have the capacity to accommodate this quantum of commercial floorspace, and this provision would result in an unviable development. This is not a deliverable or justified policy.
 - Fig 5.1 Key Diagram and Fig 7.8 Economic Development Locations in Wood Green allocates the majority of the site as “workspace”. This is not a deliverable or justified policy.
 - Policy WG2 allocates the majority of CGW as “more suitable for family housing” (3+ bed). This is not a deliverable or justified policy.
 - Policy WG6 Local Tall Buildings, Fig 7.12 Landmark Building Locations and Site Allocation WGS18 Clarendon Road does not identify the site as being suitable for tall buildings. This is incorrect as the site contains tall buildings and has planning permission to deliver tall buildings on site. Other sites within the APP have been allocated for tall buildings (SA2 Green Ridings House; SA3 Wood Green Bus Garage; SA4 Station Road Offices; SA5 Vue Cinema; SA14 Westbury & Whymark Avenue; SA15 Turnpike Triangle; SA24 Clarendon Road South)
 - Site allocation WGS18 identifies the site as the preferred location for a new decentralised energy hub to serve the Heartlands area. This is not a deliverable or justified policy.
 - Site allocation WGS18 proposes an element of supported housing in conjunction with a new adult centre (reprovided from site WGS24). There has been no assessment of alternative sites, or justification as to why site WGS18 has been chosen. This is not a deliverable or justified policy.
 - Site allocation WGS18 proposes community space to reprovide uses currently located at the Asain Centre (site WGS24). There has been no assessment of alternative sites, or justification as to why site WGS18 has been chosen. This is not a deliverable or justified policy.
- 5.4 In light of the above, we question the justification and effectiveness of the policies and allocations relevant to CGW, and in particular Site Allocation WGS18 Clarendon Road proposes, which as drafted, propose the following:-
- At least 1,610 homes
 - Indicative minimum 21,137m² of commercial floorspace
 - A workspace allocation across the site
 - The majority of the site as family housing (3+bed)
 - Two landmark buildings, but no reference to tall buildings
 - Development which does not prejudice the Downhills Park Road locally significant viewing corridor

- A new adult day centre (reprovided from WGS24) including an element of supported housing.
- Community space re-provision from the Asian Centre
- A new decentralised energy hub for the Heartlands area.

5.5 From our pre-application discussions to date with Haringey, it is clear that with a minimum of 1,610 homes, (irrespective of the other policy objectives), the site could not accommodate 21,137m² of commercial floorspace. It is therefore unsound to propose this quantum of floorspace within the AAP as it simply does not have the capacity to meet these policy objectives.

5.6 These concerns are reviewed in further detail below.

6.0 Commercial Floorspace Requirements

6.1 The step change in employment numbers and floorspace requirements between the 2016 Issues and Options AAP and the Regulation 18 AAP (2017) is unclear. The commercial floorspace requirements have increased from 1,500+ new jobs and 57,000m² of floorspace (Issues and Options AAP 2016) to 4,000 new jobs and 101,940m² (or 173,702m² employment + retail) floorspace.

6.2 Notwithstanding the above, Paragraph 7.33 states that “modelling suggests that 80,000m² gross (of B-class floorspace) is required to meet the jobs target of 4,000”. This is clearly less than that being proposed.

6.3 The location of this new floorspace is divided across Wood Green as detailed at Paragraph 6.10 Outputs.

6.10 Outputs

Sub Area	M ² emp	M ² Town Centre	net resi units
Wood Green North	16,931	14,242	1,750
Wood Green Central	19,296	37,990	1,637
Turnpike Lane	7,728	7,958	802
Heartlands	57,985	11,573	3,512
Total	101,940	71,762	7,701

6.4 The Heartlands is identified as contributing 57% of the employment target, whilst the Metropolitan Town Centre only 19% and Wood Green North only 16%. Turnpike Lane will only contribute significantly less with 8%. This distribution appears unevenly directed towards the Heartlands Area, and away from the Metropolitan Town Centre.

6.5 The distribution of this floorspace per site is explained in Appendix A, and is based upon a ratio of overall floorspace disaggregated into the three principal land use types. A standard ratio of 10% town centre/community and 20% employment floorspace is used (the AAP not define these land uses, and clearly town centre uses could comprise town centre uses), albeit, the AAP states that:-

Where details of pre-application proposals are available and considered reasonable, the relevant housing capacity and employment floorspace have also been used to inform the site allocation. Likewise, where sites have been the subject of a detailed

master planning exercise, the site allocation capacity will reflect the findings of the masterplans.

- 6.6 Owing to the positive pre-application discussions with Haringey Council, resulting in a detailed public exhibition, we would expect these discussions to influence the commercial floorspace allocation for Site WGSA18.
- 6.7 These discussions have identified that around 7,000m² could be accommodated at Site WGSA18. This is well below the draft WGSA18 AAP allocation of 21,137m² of commercial floorspace (14,091m² of commercial floorspace and 7,046m² town centre uses).
- 6.8 It is unclear why or how the Council have concluded that the commercial floorspace at WGSA18 should comprise 13% of the total residential floor area and, why town centre uses should comprise 10%. This would result in an undeliverable site allocation.
- 6.9 With regards the practicalities of delivering this floorspace, the extant planning permission for CGW contained 1080 units and 700m² of B1 floorspace (+1,800m² of Class A and Community Use), without a CIL liability. WGSA18 AAP now seeks an 89% uplift in floorspace beyond this permission which is unrealistic, certainly where the Council are proposing other policies which control development capacity at this site.
- 6.10 The commercial floorspace figure should read 7,000m² for both commercial and town centre uses for site allocation WGSA18.
- 6.11 By way of good practice, the AAP should also define what is meant by “commercial” floorspace and “town centre uses” within the glossary as at present there is unnecessary ambiguity.
- 6.12 This ambiguity is accentuated by Fig 5.1 Key Diagram and Fig 7.8 Economic Development Locations in Wood Green which seeks to allocate the majority of CGW as “workspace” (see below).
- 6.13 It is unclear what this allocation means, what policies it relates to, and why it appears to be reallocating CGW as a workspace site, when the current Local Plan does not allocate this as a Local Employment Area.
- 6.14 Workspace is defined at paragraph 7.39 as Co-working, start-up, and grow-on space light industrial units, studios, office space, serviced offices and co-working space. This type of space is compatible with residential development where it sits above it, in a podium arrangement, but is not necessarily compatible with residential uses where these are located in a lower scale courtyard arrangement as proposed by St William with the alternative masterplan.
- 6.15 Figure 7.8 also provides a graphic which indicates that “office/retail uses” will not be located at Site Allocation WGSA18. This is inconsistent with other adopted policies and is not justified or effective.
- 6.16 We therefore propose that Figure 7.8 is deleted as it is not necessary and is inaccurate.

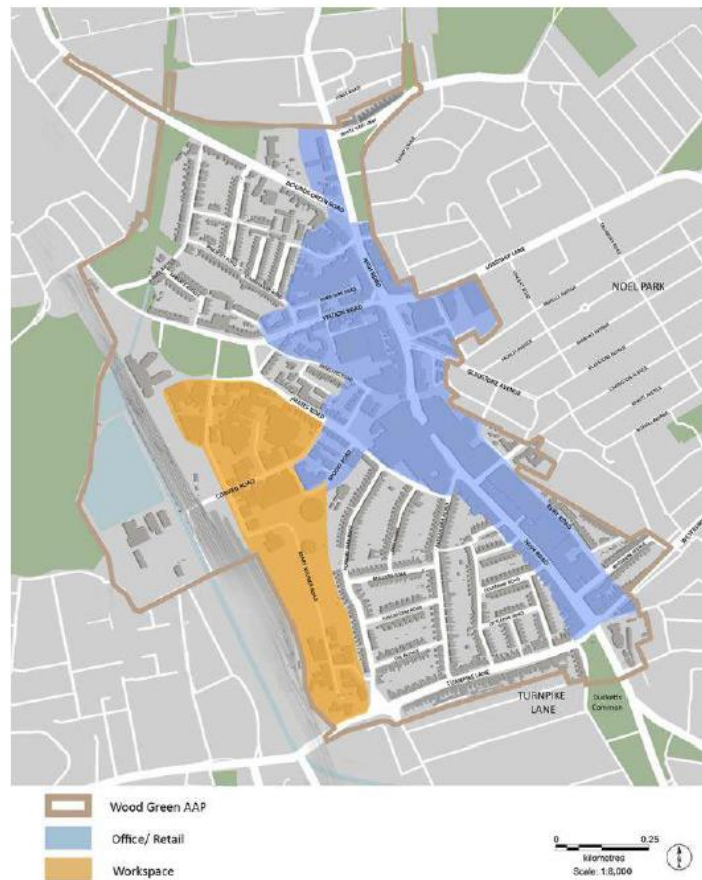


Figure 7.8: Economic development locations in Wood Green

7.0 **Housing Requirements**

- 7.1 Policy WG2 Housing and Figure 7.7 Areas More/less Suitable for Family Housing identifies the majority of Site Allocation WGS18 as being “more suitable for family housing”.
- 7.2 This is in contrast to Figure 5.1 Key Diagram and Fig 7.8 Economic Development Locations in Wood Green which identifies it for workspace.
- 7.3 The emerging Local Plan defines family housing as 3bed+ units.
- 7.4 Supporting text (para 7.21) confirms that family housing should be located away from mixed use developments. The St William proposals comprise mixed use development from Coburg Road in the north to south of the Moselle Brook. This is a significant proportion of the site and therefore should be excluded from the family housing allocation.
- 7.5 Site Allocation WGS18 allocates the site for 1,610 homes. Policy WG2(2) Housing confirms that the AAP should “provide housing in accordance with the indicative minimum capacities set out in the Site Allocations within the AAP”. This policy objective for at least 1,610 homes will not be achieved, as a matter of fact, if 3bed+ units are delivered across the majority of the site.

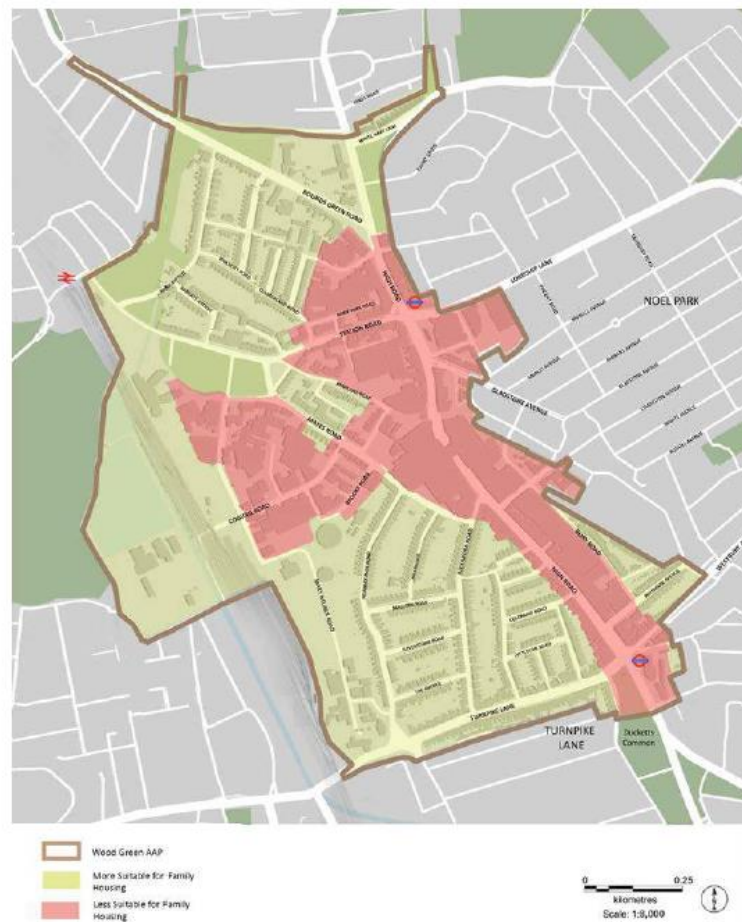


Figure 7.7: Areas more/less suitable for family housing

- 7.6 By way of reference the extant planning permission comprises 10.5% family housing. This alternative should be used as a tool to inform Figure 7.7 as it is a realistic alternative.
- 7.7 We consider that the current approach to define family/non family housing across the Heartlands is unnecessary as it is inaccurate and undeliverable. To define the majority of Site Allocation WGSA18 as more suitable for family housing is not justified or effective, and is unrealistic. The graphic should therefore be removed or revised.
- 8.0 **Tall Buildings**
- 8.1 Site Allocation WGSA18 contained tall buildings (a 42m (14 storeys) gasholder). It benefits from an extant planning permission for new tall buildings on site. The proposed St William alternative masterplan also includes a number of tall buildings (defined by the Local Plan as being 10 storeys and over).
- 8.2 St William have also demonstrated that tall buildings are required at Site Allocation WGSA18 to achieve the required housing numbers of 1,610 homes and 7,000m² of commercial floorspace.
- 8.3 It is also clear that tall buildings, taller than those proposed by St William, would be required to deliver the draft WGSA18 development capacity of:-

- minimum 21,137m² of commercial floorspace
- the majority of the site as family housing (3+bed)
- the majority of the site as workspace

- 8.4 Indeed our analysis of the commercial requirement suggests that buildings north of the Moselle would have to increase by, on average, 3 storeys to accommodate the commercial floorspace which would be located across every part of the ground, 1st and 2nd floor.
- 8.5 It is therefore unsound that Site Allocation WGS18 does not, unlike other sites, include reference to the acceptability of tall buildings, indeed these are necessary to deliver, as a minimum, 1,610 homes. Tall buildings should be referenced within draft policy WGS18.
- 8.6 Figure 7.12 Landmark Building Locations is unhelpful and ambiguous. It is unclear why the term “Landmark” is used in this document when Tall/Taller Buildings are used elsewhere. Indeed as paragraph 7.48 describes “A landmark building should be of exceptional design within the centre, but doesn’t necessarily have to be a tall building as defined by DM6”.

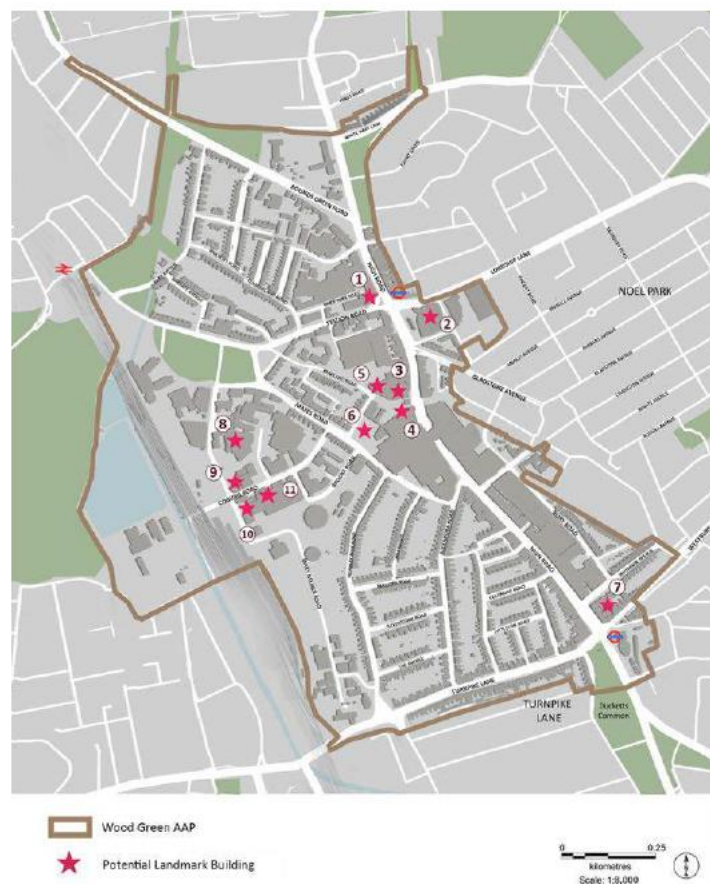
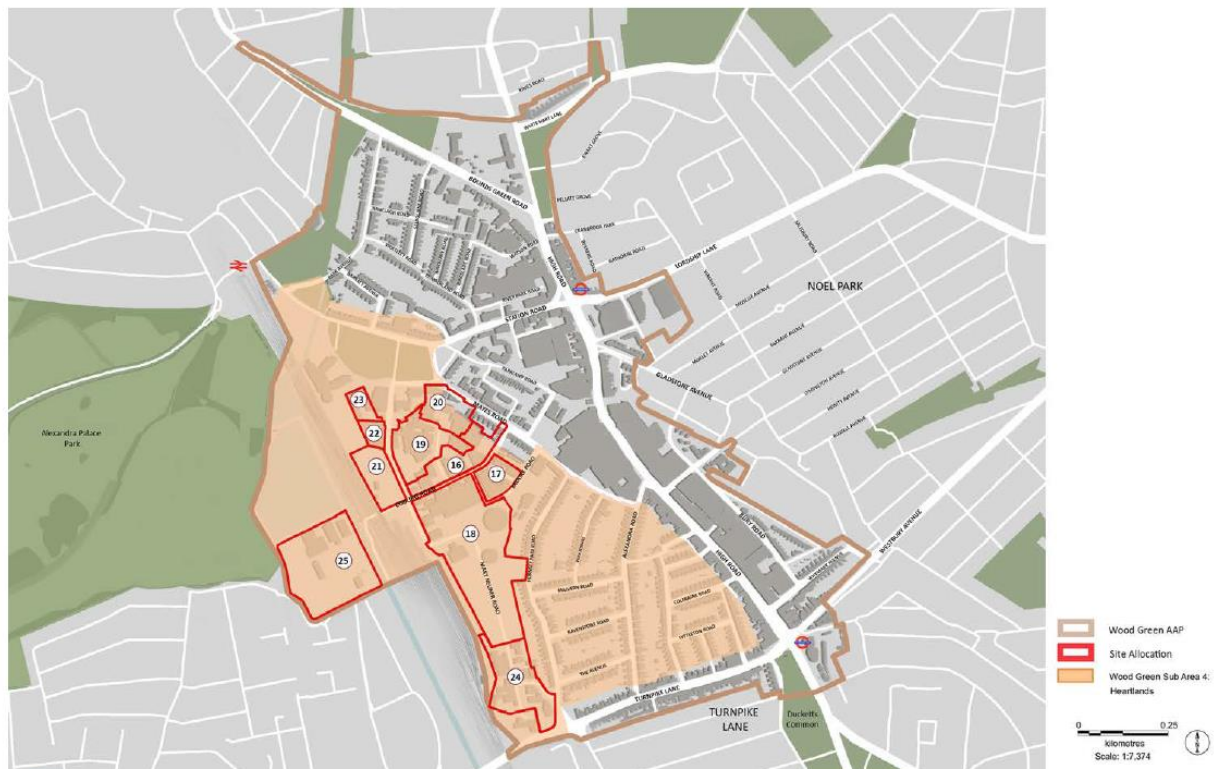


Figure 7.12: Landmark building locations

- 8.7 It would be clearly more desirable and sound to allocate locations of potential tall buildings at Figure 7.12 rather than landmark buildings, with the final design detail subject to Local Plan policy, certainly as the Site Allocations refer to Tall Buildings.

- 8.8 As part of this analysis a map defining the existing tall buildings in the AAP area is necessary.
- 8.9 With regards to Policy WG5 Local Tall Buildings and Local Views Policy, Part(b) promotes publically accessible access to the top of tall buildings in the AAP. This is opposed for residential buildings for reasons of security and privacy and this has not been part of the London Plan (MALP 2016) approach in central London.
- 9.0 **Energy Hub**
- 9.1 Site allocation WGS18 identifies the site as the preferred location for a new decentralised energy hub of 2,700m², and 3 storeys high, to serve the Heartlands area. This policy approach is supported by Aecom Wood Green Decentralised Energy Options Report. St William object to this proposal as it is unsound.
- 9.2 St William propose that the alternative masterplan will deliver a basement area of 700m², which will contain plant necessary to serve the St William development only. This facility will however have spare cubic floorspace for additional plant, paid for by adjacent developers, to serve additional developments. It would not serve the whole AAP, nor indeed the wider Heartlands (as defined below).
- 9.3 The WGS18 allocation should therefore recognise this, and confirm that the cost of additional plant, beyond that provided for the St William development itself, should be borne out by the developments/landowners being supplied.



- 9.4 With regards to the technical evidence submitted to support this policy, the Aecom Wood Green Decentralised Energy Options Report gives rise to concern as to how the policy for a decentralised energy hub has been justified:-

- The Aecom proposed Energy Centre is out of proportion to the demands of the WGSA18 site that it proposes to be located on. Only about 20-25% of the heat output of the Aecom advised Energy Centre would be required by WGSA18. It is not sound, reasonable, nor NPPF Paragraph 173 compliant as it places undue burdens on the landowner, certainly as the cost of the plant is expected to be c.£31M.
- Stage 2 feasibility work regarding energy from waste (EfW) contradicts the Aecom recommendation for the entire heat capacity to be provided on WGSA18. If the EfW came forward then the viability of the Energy Centre would be compromised (if already constructed for entire heat load) and vice versa. EfW is much more sustainable than a CHP engine or gas boiler.
- The justification for determining the location of the energy hub (page 29) is unsound, and appears to pre-determine Site allocation WGSA18. It discounts location EC4 as it is adjacency to railway. It is also the same reason that EC2 is discounted. The St William masterplan now proposes the Energy Centre in a building adjacent to the railway, in the broad location of EC4. This undermines the site analysis of Aecom and the reasons that it discounts other siting opportunities. Given the extensive development opportunities within Wood Green, and Council land ownership, it remains unjustified why alternative sites cannot accommodate the Energy Hub, or one of a number of smaller Hubs.
- The EC5 St William location is proposed by Aecom despite it appearing to be less positive than other options (Page 29) raising concerns about pre-determination.
- kW loads for each Wood Green development site are requested to be provided by the Council.
- Finally there is a concern regarding the Council's approach to the Carbon Offset Cost. The GLA's Guidance on Energy Assessments (2016) advises a cost of £60 per tonne, whilst Haringey propose £90. Paragraph 5.5 and 14.3 of the GLA's Guidance on Energy Assessments indicate that a levy of £90 cannot be charged, and therefore this should be addressed.

10.0 **Other Issues**

- 10.1 **Other Uses** – The allocation includes reference to ‘supported housing’ in conjunction with a day centre (reallocated from site SA24), and the re-provision of uses currently in the ‘Asian Centre’ (Site SA9). There is no evidence or optioneering exercise to support this proposal, and why other sites within the AAP have been discounted. The policy is also unclear with regards to what “supported housing” means; the floorspace being proposed; the “uses” within the Asian Centre; and the financial implications of this policy; and offsetting of costs (build cost and rental profile) should this take place. For these reasons the approach fails the necessary tests of the NPPF. It should be noted that these uses do not form part of the extant planning permission which included a viable medical centre.
- 10.2 **Chapter 3: Portrait of the Area, Transport and movement, Traffic Movements, page 23** – Paragraph 3.27 suggests that Mary Neuner Way has ‘spare capacity’ to accommodate more traffic. As the site is planned to be redeveloped for residential uses, this approach is not supported and has not been discussed with St. William to date. This approach also fails to chime with Site SA24 which seeks to enhance pedestrian routes.
- 10.3 **Chapter 3: Portrait of the Area, page 29** – The Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis for the AAP Area, needs to include reference to the delivery of new residential homes within the ‘Opportunities’ section.
- 10.4 **Chapter 3: Portrait of the Area, page 29** – The Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis for the AAP Area, suggests within the ‘Threats’ section, that without Crossrail, the viability of schemes is undermined. We do not fully agree with this suggestion and believe Wood Green can achieve substantial growth with or without Crossrail.

- 10.5 **Chapter 3: Green Spaces and Waterways, page 18** – Paragraph 3.9 refers to the Moselle River. The paragraph does not however relate to Chapter 8 Site Allocations at which there are several site allocations which seek investigations for the Moselle’s future use and the delivery of new open space above the alignment of the Moselle. This is important as there should be a strategic approach to the River Moselle, certainly for sites such as the Iceland Site which are not subject to Chapter 8 allocations, but which contain the River Moselle.
- 10.6 **Chapter 4: Key Issues Challenges and Drivers, Housing Need, page 49** – Paragraphs 4.24 – 4.28 fail to recognise that the housing targets proposed are the minimum requirements in order to meet housing need. The AAP should seek to maximise the delivery of housing numbers and not aim to just meet the minimum requirements.
- 10.7 **Chapter 7: AAP Area Wide Policies, Policy WG5: Wood Green’s Urban Design Framework** – Part 6E(ii) of the policy suggests that a new pedestrian and cycling connection is established from the S-bend on Mary Neuner Way to Wood Green Common. The extant permission for the Haringey Heartlands does not contain a cycle connection. We do recognise that a new masterplan could include a “shared pedestrian and cycle friendly route” north of the S bend.
- 10.8 **Community Infrastructure Levy (CIL)** – We believe that the AAP should contain a policy regarding the use and expenditure of CIL within the AAP area, and the appropriate use of s.106 legal obligations to ensure the betterment of Wood Green.

End.