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LB Haringey LDF Core Strategy DPD 'Proposed Submission' May 2010 Draft –
Representations Submitted by **Knight Frank LLP** on Behalf of the Camden and
Islington NHS Foundation Trust

Knight Frank's Planning Department has been instructed by the Camden and Islington NHS Foundation Trust to submit representations to the May 2010 proposed submission version of the LB Haringey LDF Core Strategy Development Plan Document which sets out the vision and key policies for the future development of Haringey up to 2026.

The Camden and Islington NHS Foundation Trust (referred to as the 'Trust') own freehold the 2.45 hectare St Luke's Woodside Hospital site located off Woodside Avenue which is a part vacant / part occupied mental health facility with associated administrative element. The Trust are currently considering the future of the St Luke's Woodside Hospital site as part of a strategic review of mental health service delivery and the related operational property portfolio.

It is important to note that no decision has yet been made regarding the future of the site but it is considered that, given the LDF Core Strategy DPD document is intended to inform the acceptability of future redevelopment in the Borough over the next 15 years, that it is important for the Trust to submit representations to the May 2010 proposed submission version of the LDF Core Strategy DPD. These representations seek to ensure that emerging development policies support and provide sufficient flexibility in the context of the potential future redevelopment of the Saint Luke's Woodside Hospital site.

Comment No. 1

Chapter 1 – Introduction

10/169 23/1/12

Page 11 – Haringey in London and North London

The Trust supports the aim, as set out in bullet point 5 on pg. 11 of the May 2010 version of the LDF Core Strategy DPD, of "making better use of urban land enabling more housing and business." It is imperative that the LB Haringey within the LDF Core Strategy DPD recognise that the Borough is heavily developed and there is a pressing need to ensure that additional new housing required to deliver the estimated 11,195 new dwellings to 2026 (para. 2.1.2) is accommodated on suitable

previously developed land. The Council must ensure that the density and quantum of development delivered on suitable sites is optimised in order to make the most of the Borough's finite land resources.

Comment No.2

33/2/13

Chapter 1 – Introduction

10/70

Page 38 – Muswell Hill Area Assembly

The 1st bullet point under the 'opportunities' heading on pg. 38 of the May 2010 version of the LDF Core Strategy DPD states that *"no major development is proposed for the (Muswell Hill) area."* Knight Frank LLP, on behalf of the Trust, responded to a 'call for sites' exercise undertaken by the LB Haringey in December 2009. The representations made it clear that the St Luke's Woodside Hospital site is currently being considered as part of a strategic review of mental health service delivery and, if declared surplus to future service delivery requirements, may become available for redevelopment.

Following the submission of representations to the LB Haringey December 2009 'call for sites' exercise, the St Luke's Woodside Hospital site was included on pg. 38 of the May 2010 version of the LDF Site Allocations DPD (to which further representations have also been made on behalf of the Trust). Given the size of the site at 2.45 ha, and its status as sequentially preferable 'previously developed land' as defined in Annex B of the June 2010 version of Planning Policy Statement 3 'Housing' (PPS 3), it is considered that St Luke's Woodside Hospital has significant future redevelopment potential.

Although the final quantum of development that could be introduced onto the site would be informed having regard to detailed masterplanning and design, the density matrix at Table 3A.2 of the adopted 2008 London Plan suggests that between 200-700 hr / ha could be accommodated on this urban site with a PTAL rating of 4. Given the existing built coverage of the site, and the likely acceptable density ranges that could be achieved in this accessible part of the Borough, it is suggested that the 1st bullet point under the 'opportunities' heading on pg. 38 of the May 2010 version of the LDF Core Strategy DPD is amended to recognise the opportunity for the St Luke's Woodside Hospital site to be a significant (re)development site in the Muswell Hill Area Assembly over the lifetime of the plan. The text change **"limited major development proposed for the area"** would ensure that the LDF Core Strategy DPD is consistent with the LDF Site Allocations DPD with both acknowledging the future

development potential of the St Luke's Woodside Hospital site in the context of the Muswell Hill Area Assembly.

Comment No.3

Chapter 1 – Introduction

Page 40 – Figure 1.12: Challenges Facing Haringey

10/7/1

33/3/1.4

As set out above, the LDF Core Strategy DPD should recognise the opportunity for the St Luke's Woodside Hospital site to be a significant (re)development site in the Muswell Hill Area Assembly over the lifetime of the plan. The identification of the St Luke's Woodside Hospital site as having the potential to deliver residential and community led redevelopment is of benefit to the LDF Core Strategy DPD given the inequality of projected population increase over the Borough as shown in Figure 1.12. It is important that the LDF Core Strategy DPD more explicitly recognises that the Council will seek to optimise the development of suitable sites located in the west of the Borough in order to relieve some of the pressure on housing, jobs and local services that is currently experienced to the east of Haringey in areas such as Northumberland Park and Tottenham Hale.

Because of the lower number of available redevelopment sites located in the west of the Borough, it is imperative that the LDF Core Strategy DPD explicitly commits to ensuring that future development on those sites suitable for redevelopment is optimised. This approach would ensure more equality in terms of where new housing and associated services are introduced over the lifetime of the plan. It would also provide future residents with more choice regarding where they wish to live in the Borough by providing new housing in those parts of Haringey, such as Muswell Hill, where there is severe pressure upon the available stock. This policy approach would be consistent with the overriding aim of the LDF Core Strategy of delivering new homes at the right place and at the right time (para. 1.5.3).

Comment No.4

33/4/1.4

Chapter 1 – Introduction

LD 172

Page 44 – Challenges Facing Haringey

The Trust supports the wording of paragraph 1.4.23 on pg. 44 of the LDF Core Strategy DPD which recognises that *“land is a finite resource and ... we must seek to reuse Brownfield land and promote more efficient use of land as an alternative to developing on green spaces.”* This approach accords with the guidance set out in both Planning Policy Statement 1 *‘Delivering Sustainable Development’* (PPS 1) and Planning Policy Statement 3 *‘Housing’* (PPS 3) regarding the efficient use of previously developed land.

The LDF Core Strategy DPD must reiterate the point made previously regarding the heavily built up nature of Haringey which places pressure upon the need to optimise the development of those finite number of previously developed sites that are capable of accommodating predicted growth in housing and jobs. The Council must ensure that they adopt a proactive approach to ensuring that the redevelopment of previously developed sites optimises the delivery of housing or commercial floorspace thus reducing pressure that may otherwise be felt by Greenfield sites such as public open spaces. This approach is in direct accordance with PPS 3 which requires developments to *“make efficient and effective use of land”* (para. 14) with the *“priority for development should be previously developed land”* (para. 36).

Comment No.5

33/5/1.5

Chapter 1 – Introduction

LD 173

Page 46 – Vision and Objectives

The LDF Core Strategy DPD begins to draw upon the link between the desirability of new homes and new jobs introduced into the Borough having access to supporting community services and public transport. These representations suggest that the LDF Core Strategy DPD should go a step further by explicitly stating the desire for the majority of new homes and new jobs delivered in Haringey over the period of the plan to be well served by existing and proposed local services (e.g. community services, local shops, public open spaces etc) and public transport nodes. This acknowledgement would better relate to the guidance set out at para. 27 (iv) of PPS 1 which requires Local Authorities

to "bring forward sufficient land of a suitable quality in appropriate locations ... taking into account issues such as accessibility and sustainable transport needs." This aspiration for new development to, where feasible, be well located to existing and proposed local services and public transport nodes, should be more explicitly communicated throughout the LDF Core Strategy DPD.

Comment No.6

Chapter 1 – Introduction

10 - 174

33/6/1.5

Page 49 – Context and Main Issues

In light of the representations made previously, the Trust is supportive of the acknowledgement made within the 1st and 3rd bullet points set out on pg. 49 of the LDF Core Strategy DPD that the Council will aim to "make the best use of Haringey's land" and "integrate transport and land use." These key principles accord with the guidance set out in both PPS 1 and PPS 3 and will ensure that the LB Haringey make the most efficient and sustainable use of those finite previously developed sites that are capable of accommodating the projected increase in housing and jobs to be delivered within the Borough over the next 15 years.

The 7th bullet point on pg. 49 refers to good design in the context of "protecting and enhancing the Borough's distinctive characteristics, historic environment ..." The Trust considers that the LDF Core Strategy DPD should adopt a more progressive and flexible approach towards the relationship between the Borough's existing heritage assets and new development. Whilst any future development should have careful regard to those features of Haringey's built environment that contribute to its special and unique character, the LDF Core Strategy DPD should also recognise that there is no conflict between modern development of the highest architectural quality and the need to take into consideration the existing built environment and its associated heritage assets.

The Council should ensure that the policy approach taken is not one of containment and restraint with regard to new development but rather one that is proactive, recognising that contemporary, modern development can compliment and respond to existing heritage assets without undermining their special townscape, architectural or historical interest in line with Planning Policy Statement 5 'Planning and the Historic Environment' (PPS 5). The most successful neighbourhoods are those that are able to comfortably and successfully accommodate development of a variety of different architectural styles across a range of different periods.

Comment No.7

33/7/2.1

Chapter 2 – Haringey’s Spatial Strategy

Page 54 – Haringey’s Spatial Strategy

10176

In light of the representations made previously, the Trust supports the wording set out at para. 2.1.1 on pg. 54 of the LDF Core Strategy DPD regarding *“the provision of homes, jobs and other facilities in areas with significant redevelopment opportunities at, or near, transportation hubs and support appropriate development at other accessible locations.”*

Although dealt with in more detail elsewhere in these representations, the recognition within the 3rd bullet point on pg. 54 that larger redevelopment sites offer opportunities for site-wide renewable energy generation (e.g. CHP) is supported by the Trust.

Comment No.8

10178

33/8/2.1

Chapter 2 –Haringey’s Spatial Strategy

Page 56 – Haringey’s Spatial Strategy

The wording of para. 2.1.6 on pg. 56 of the LDF Core Strategy DPD is supported as it recognises that although the designated Growth Areas are those parts of the Borough that are likely to experience the most change and development over the period of the plan, there will be numerous other parts of the Borough that will be considered suitable locations for significant development given their accessibility by a range of means of transport.

The Trust also supports the wording of para. 2.1.7 on pg. 56 of the LDF Core Strategy DPD as currently drafted which seeks to *“make the best use of the Borough’s limited land and resources,” “promote the most efficient use of land in Haringey”* and *“improve the quality of our environment.”*

In light of representations made previously, the Trust supports the wording of para. 2.1.8 on pg. 56 of the LDF Core Strategy DPD as currently drafted as it recognises the need to make the most efficient use of land in the Borough by encouraging development at higher densities. The wording could be improved by making it clear that the Council perceives no conflict between high density development

and development that is contextually appropriate in the context of the existing townscape. Higher density developments can be accommodated on previously developed land across Haringey so long as they adopted high quality design and sensitively consider the character and built form of their surroundings. This ensures that previously developed land is used efficiently to deliver the quantity and quality of development that is required over the period of the plan.

Comment No.9

10/181 33/9/3.1

Chapter 3 – People at the Heart of Change in Haringey

Page 59 – Policy SP1 ‘Managing Growth’

no change

The Trust supports the commitment to “*maximising the supply of additional housing*” to meet or exceed the housing delivery targets set out in the adopted 2008 London Plan and likely to be revised upwards in conjunction with the 2009 consultation draft replacement London Plan. This approach directly accords with the wording of Policy 3A.2 of the adopted 2008 London Plan which requires Development Plan Documents (DPD) to “*seek to exceed the figures (targets for additional homes) in Table 3A.1.*”

Comment No.10

Chapter 3 – People at the Heart of Change in Haringey

33/10/3.1
10/184

Pages 59 and 75 – Managing Growth

The Trust strongly objects to the wording of para. 3.1.41 on pg. 75 of the LDF Core Strategy DPD which states that in defined ‘Areas of Limited Change’ the Council envisages “*development to be of an incremental nature and it should not change the character of these areas.*” At present this policy approach is unsound in the context of Planning Policy Statement 12 ‘*Local Spatial Planning*’ (PPS 12) as it is in direct conflict with the May 2010 version of the LDF Site Allocations DPD which identifies a number of potential future development sites, including the 2.45 ha St Luke’s Woodside Hospital, which are of a significant size and fall within the defined ‘Area of Limited Change.’

The wording of para. 3.1.41 must be amended to recognise that although the defined ‘Areas of Limited Change’ may not experience the same quantum of development over the next 15 years as

other parts of the Borough – particularly the Growth Areas – there are nevertheless individual sites, such as St Luke's Woodside Hospital, which are of a scale that would allow the introduction of development considered to be significantly more than simply *"of an incremental nature."* The text as currently drafted incorrectly assumes that no sites other than those of a small or incremental nature would come forward for development in the defined 'Areas of Limited Change.' This is in conflict with the LDF Site Allocations DPD which identifies sites, such as St Luke's Woodside Hospital, which are of a size where any redevelopment would be of a larger scale and certainly more than incremental in nature.

Para. 3.1.42 on pg. 75 of the LDF Core Strategy DPD also refers to defined 'Areas of Limited Change' and advises that development *"respects the character of its surroundings, conserves heritage and other important features."* Whilst the Trust does not disagree, the paragraph should be amended to recognise that such a policy requirement to ensure that redevelopment is contextually appropriate is not unique to 'Areas of Limited Change' specifically, but should be applied to any new development introduced anywhere in the Borough. At present there is a risk that the paragraph could be interpreted as all future development brought forward in the defined 'Areas of Limited Change' being subject to a more restrictive policy approach that could prevent the bringing forward of schemes that are of a contemporary or architecturally innovative nature. In line with representations made previously, the LDF Core Strategy DPD should make it clear that there is no conflict between optimising density using contemporary or innovative design approaches in a manner that respects and reinforces the character of the existing townscape. A balanced approach more akin to that taken at para. 2.1.8 on pg. 56 of the LDF Core Strategy DPD would be more appropriate in the context of the defined 'Areas of Limited Change.'

Comment No.11

ID 340

33/11/3.2

Chapter 3 – People at the Heart of Change in Haringey

Page 78 – Housing

The Trust supports the aims of para. 3.2.1 on pg. 78 of the LDF Core Strategy DPD which seeks to *"foster the development of balanced neighbourhoods where people choose to live (and) which meet the housing aspirations of Haringey's residents."* This founding principle is reiterated at para. 3.2.2 which states that *"the Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford in a community where they want to live."*

Referring back to comments made previously in the context of defined 'Areas of Limited Change' and the uneven spatial concentration of population growth in the east of the Borough, it is imperative that the Council proactively promotes and supports the redevelopment of previously developed land falling, such as the St Luke's Woodside Hospital site, in those parts of Haringey that are unlikely to see substantial housing growth over the period of the plan. If the LDF Core Strategy DPD adopts a protectionist approach towards development in large parts of the Borough defined as 'Areas of Limited Change,' it risks failing to achieve the aim of providing new housing in balanced neighbourhoods where people choose to live. To achieve such a strategy, the Council must seek to ensure that all parts of the Borough experience some new residential development so that future residents have some choice over where in Haringey they may choose to live.

Comment No.12

33/12/3.2

Chapter 3 – People at the Heart of Change in Haringey

ID 341 ✓

Page 79 – Housing

The Trust strongly supports the general wording of Policy SP2 on pg. 79 and the aim of "*making full use of Haringey's capacity for housing,*" "*maximising the supply of additional housing*" and "*meeting or exceeding (housing) targets.*"

The wording of point 5 on pg. 79 should be amended to better relate to Policy 3A.10 of the adopted 2008 London Plan by recognising that the proportion of affordable housing sought in association with development should be reasonable having regard to "*the need to encourage rather than restrain residential development and (taking into account) the individual circumstances of the site.*" Point 5 should therefore be amended to read "*requiring sites to aim to provide 50% affordable housing on site where reasonable and viable having regard to site specific considerations.*"

Similar flexibility should also be built into point 6 on pg. 79 recognising that an "... *approximate tenure split of 70% social rented housing and 30% intermediate housing*" will be sought but "*based on a consideration of localised housing need.*" This approach recognises that different parts of the Borough will have different demands placed upon its existing housing stock and that any new development should have regard to localised patterns of need when delivering affordable housing.

33/13/3.2

Comment No.13

Chapter 3 – People at the Heart of Change in Haringey

ID 342 ✓

Page 82 - Housing

Para. 3.2.10 on pg. 82 of the LDF Core Strategy DPD recognises that *"there is a need to encourage a greater mix of housing across the Borough."* There is a risk that unless the Council actively supports the redevelopment of suitably located previously developed land in the Borough for new housing at optimised densities that benefits associated with associated affordable housing delivery will not be felt.

Comment No.14

33/14/3.2

ID 343 ✓

Chapter 3 – People at the Heart of Change in Haringey

Page 84 – Housing

The Trust supports the wording of para. 3.2.21 on pg. 84 of the LDF Core Strategy DPD and the intention of the Council to *"seek to achieve the maximum reasonable proportion of affordable housing."* This flexible approach ensures that the percentage of affordable housing sought from private developments is maximised without prejudicing the viability of the scheme in question. The Trust also supports the carrying out of an Affordable Housing Viability Study for Haringey but would request that its findings are applied flexibly and allow for a consideration of site specific costs and constraints (e.g. contamination or enabling development) that may affect scheme viability.

Comment No.15

33/15/4.1

ID 350

Chapter 4 – An Environmentally Sustainable Future

Page 91 – Working Towards a Low Carbon Haringey

The Trust supports the wording set out at point 1(a) of Policy SP4 on pg. 91 of the LDF Core Strategy DPD that from 2011 all new residential development *"should aim at achieving CSH Level 6."* This approach seeks to promote the highest standards of sustainable design and construction whilst

simultaneously providing flexibility that recognises that not all schemes will be able to achieve the highest CSH levels due to site specific conditions, viability or environmental constraints.

The Trust also supports the wording of point 2 (a), (b), (c) and (d) of Policy SP4 of the LDF Core Strategy DPD which seek to promote the provision of site-wide and area-wide energy networks in association with new development but with the acknowledgement that only where this is viable or feasible. Referring back to comments made previously, Policy SP4 on pg. 91 and para. 4.1.11 on pg. 93 of the LDF Core Strategy DPD should reiterate that the Council will seek to promote the redevelopment of larger previously developed sites that are of a sufficient size to accommodate site-wide decentralised energy facilities including CHP.

The Council may wish to consider how they could commit to proactively engaging with developers to achieve the highest standards of environmental and sustainability planning. More developments are likely to come forward with higher than typical CSH levels or the incorporation of low and zero carbon technologies if the LB Haringey commits to engaging with developers in terms of how such initiatives could be incorporated into developments in a cost efficient and straightforward manner.

Comment No.16

33/16/4-1

Chapter 4 – An Environmentally Sustainable Future

70351

Page 92 – Working Towards a Low Carbon Haringey

The Trust supports the wording of para. 4.1.4 on pg. 92 of the LDF Core Strategy DPD which recognises that two of the most important principles of sustainable development, as recognised in PPS 1, involve making the most efficient use of existing land and buildings and ensuring that new development is well connected to existing infrastructure (including transport) to reduce private vehicle movements. These principles should be incorporated into the heart of Haringey's approach towards sustainable development.

33/17/4.1

Comment No.17

Chapter 4 – An Environmentally Sustainable Future

ID 352

Page 94 – Working Towards a Low Carbon Haringey

The Trust supports the intention set out at para. 4.1.13 on pg. 94 of the LDF Core Strategy DPD to “consider the feasibility of reaching zero carbon for residential developments before 2016.” This approach ensures that if such standards are adopted ahead of time, that they are informed by a robust evidence base that demonstrates their achievability and viability in the spatially specific development context of Haringey.

Para. 4.1.17 on pg. 94 of the LDF Core Strategy DPD should be amended to read “major development proposals should assess connection to existing heating and cooling networks, provision of a site wide CHP network, and communal heating and cooling systems where **viable and practical**.” This suggested amendment supports the opportunities identified by the LDF Core Strategy DPD for larger sites to achieve substantial energy and carbon savings but recognises that if there are practical difficulties to achieving such objectives, that the policy applies sufficient flexibility to take this into account.

33/18/4.1

Comment No.18

Chapter 4 – An Environmentally Sustainable Future

ID 353

Page 96 – Working Towards a Low Carbon Haringey

The Trust supports the wording of para. 4.1.22 on pg. 96 of the LDF Core Strategy DPD that seeks to achieve a minimum 20% reduction in predicted carbon dioxide emissions “unless it can be demonstrated that such provision is not feasible.”

Comment No.19

33/19/4.4

Chapter 4 – An Environmentally Sustainable Future

10 354

Page 106 – Policy SP7

Referring back to comments made previously, the Trust is supportive of the wording of para. 4.4.1 on pg. 105 and Policy SP7 on pg. 106 of the LDF Core Strategy DPD concerning the intention of the Council to make a direct and clear link between the acceptability of future development sites – and the quantum of new development they are able to comfortably accommodate – and their connectivity to the existing public transport network.

Comment No.20

33/20/5.1

Chapter 5 – Economic Vitality and Prosperity Shared by All

10 355

Page 113 – Policy SP8

The Council should ensure that the wording of Policy SP8 on pg. 113 of the LDF Core Strategy DPD is amended to make it clear that it relates to existing employment sites which currently fall within Classes B1(a-c), B2 and B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended) only. The protection afforded to existing B class employment sites in Haringey is supported in the context of the anticipated number of new jobs to be accommodated in the Borough over the lifetime of the plan. It is important that the Council encourages the redevelopment and upgrading of existing B class employment sites to offer the type of accommodation required by sectors such as green industries and small / medium sized businesses that are to be encouraged to locate in Haringey over the next 15 years. The Council should consider whether Policy SP8 is consistent with the inclusion of a number of existing B class employment sites in the May 2010 version of the LDF Site Allocations DPD which are identified as potentially suitable for redevelopment for non-employment uses including housing.

The Council must ensure that all LDF documents are consistent and if existing B class employment sites are included in the Site Allocations DPD for redevelopment for non-employment purposes, that a full and robust assessment has been carried out to demonstrate their unsuitability for continued B class employment use purposes. This must be undertaken if the DPD is to accord with the recommendations of the Haringey 2008 Employment Study which, as made clear in para. 5.1.18 on

pg. 117 of the LDF Core Strategy DPD, "recommended that all existing employment sites (designated or otherwise) be retained."

33/21/5.2

Comment No.21

Chapter 5 – Economic Vitality and Prosperity Shared by All

10356 ✓

Page 122 – Improving Skills and Training

Para. 5.2.8 on pg. 122 of the LDF Core Strategy DPD should be amended to read "the Council is committed to encouraging small start-up units in new developments **where there is a demonstrable viable demand for such space.**" This amendment will ensure that start-up units will only be delivered in conjunction with new development where there is an identified need for such business space and it will be readily occupied.

Comment No.22

33/22/5.3

Chapter 5 – Economic Vitality and Prosperity Shared by All

10360 ✓

Page 129 – Town Centres

Para. 5.3.20 on pg. 129 of the LDF Core Strategy DPD should be amended to recognise that the Council will promote the development of appropriate sites lying within walking distance of town centres thus facilitating access to a range of local and community based services for future residents. There are clear sustainability benefits in the Council ensuring the most efficient development of land located in proximity to town centres given their accessibility to local services and public transport nodes. This approach accords with PPS 1 'Delivering Sustainable Development' and PPS 4 'Planning for Sustainable Economic Growth.'

3.3/23/6.2

Comment No.23

ID 365 ✓

Chapter 6 – Safer for All

Page 142 – Policy SP12

Referring back to comments made previously, the Trust would encourage the Council to amend the wording of Policy SP12 of the LDF Core Strategy DPD to more clearly recognise that opportunities exist in the context of PPS 5 for contemporary and modern new development to come forward in Conservation Areas that are able not only to enhance their character, but also contribute to the historic reading and development of the area as a whole. There is a risk that if the Council focuses solely on the need to 'preserve' existing Conservation Areas, that potentially innovative, contemporary and inspiring new developments are discouraged from coming forward in these areas. PPS 5 does not seek to preserve Conservation Areas *in situ* but rather to ensure that the best parts of their character and appearance are protected whilst simultaneously recognising their ability to accommodate contemporary and modern new development of the highest architectural quality.

Comment No.24

33/24/6.2

Chapter 6 – Safer for All

ID 366 ✓

Page 142 – Conservation

Given the existing designations accruing to the site of St Luke's Woodside Hospital, the Trust would urge the Council to commit to preparing guidance relating to individual 'Locally Listed Buildings of Merit' and 'Local Historic Green Spaces.' Such guidance would assist landowners in understanding the special local interest that their sites possess and how any (re)development could be designed to ensure that the most important features and elements of the site are preserved and incorporated into the design of any future scheme.

Historic designated heritage areas

Comment No.25

33/25/6.3

Chapter 6 – Safer for All

~~10366~~

Page 149 – Policy SP13

10368 ✓

Policy SP13 on pg. 149 of the LDF Core Strategy DPD should be more explicit regarding the protection of open spaces and the priority of protecting those spaces that have particular benefits to the local community in terms of recreation, accessibility, leisure or ecology. The 1st bullet point should also recognise that the redevelopment of sites located adjacent to existing open spaces will be acceptable but that they must be sensitively designed to ensure that there is no detriment to the special features of the adjacent open space (whether this be openness, ecology or sunlight penetration).

adj

10370 ✓

33/26/6.3

The 8th bullet point on pg. 149 of the LDF Core Strategy DPD should be more flexible with regard to the protection of existing trees on future development sites. The Council should allow for the loss of existing trees if applicants are able to demonstrate that the replacement planting scheme would deliver benefits over and above that which the existing trees already provide in terms of native species, longevity of lifespan and ecological value.

tree S.

33/27/6.3

Comment No.26

10339 ✓

Chapter 7 – Healthier People with a Better Quality of Life

Page 165 – Health and Well-being

The Trust supports the priority of para. 7.1.11 of the LDF Core Strategy DPD in seeking to prioritise the delivery of adequate care facilities to meet the objectives of residents of Haringey. The Council should encourage and require new developments to include appropriate social and community facilities for which there is demonstrable localised need and demand.

Comment No.27

Chapter 8 – Delivering and Monitoring the Core Strategy

33/28/8.1

Page 185 – Community Infrastructure

ID 371 ✓

The Trust supports the aim of Policy SP16 of the LDF Core Strategy DPD by seeking the "improvement and enhancement of community facilities and services for Haringey's communities." It is recognised that St Luke's Woodside Hospital has primarily offered health services for residents of Camden and Islington and that the redevelopment of the site, for residential and community purposes, offers an opportunity to directly address the aim of Policy SP16 by delivering community infrastructure for which there is a demonstrable local need.

The Trust supports the wording of para. 8.1.5 on pg. 186 of the LDF Core Strategy DPD regarding "the protection of existing facilities" but requests that the text is amended to make it clear that this is only in cases where the existing community facilities "serve residents of Haringey." The Council should recognise within the LDF Core Strategy DPD the opportunity of promoting the redevelopment of a site that does not currently offer community facilities available to local Haringey residents - St Luke's Woodside Hospital – for mixed-use development that includes local community services for which there is a demonstrable local need. The opportunity for such community facilities to be multi-purpose is noted and supported.

Comment No.28

Chapter 8 – Delivering and Monitoring the Core Strategy

33/29/8.2

Page 196 – Delivering and Monitoring the Core Strategy

ID 372 ✓

The Trust is supportive of the aim of the Council producing a Community Infrastructure Plan (CIP) which would provide more certainty to future developers regarding the infrastructure needs in Haringey and the way in which new developments will be expected to provide associated financial contributions. It is of course imperative that any CIP recognises that new development is only one source of funding for new or improved social and community infrastructure and should be considered alongside other more traditional contributors (e.g. Council Tax, grant funding etc).

