

March 2015

**London Borough of Haringey
Local Plan Consultation Documents
(February 2015)**

**Formal Planning Representations
On behalf of the NHS Property Services**

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Contents

1. Introduction	3
2. Background to the Site	4
3. Draft Alterations to Strategic Policies	5
4. Draft Site Allocations DPD	7
5. Draft Development Management Policies DPD	11
6. Conclusions	166

Appendices:

- A. Site Plan
- B. Plot Map
- C. Suggested Revision to SLOL Boundary on Map for Draft Allocation SA45

1. Introduction

- 1.1 Savills has been instructed by NHS Property Services Ltd (NHSPS) to prepare and submit the following representations in response to the three Local Plan documents published by the London Borough of Haringey (LBH) for public consultation in February 2015. These documents are:
- Draft Local Plan: Alterations to Strategic Policies 2011-2026 (February 2015);
 - Draft Local Plan: Site Allocations DPD (February 2015); and
 - Draft Local Plan: Development Management Policies DPD (February 2015).
- 1.2 NHSPS manages and maintains about 3,700 holdings across England.
- 1.3 NHSPS is the freehold owner of property and land known as 55a Cholmeley Park, Highgate (the site), as shown at **Appendix A**, which is currently leased to The Harrington Scheme (THS).
- 1.4 The site is located within the emerging Highgate Neighbourhood Plan (January 2015) Key Area 3: Highgate Bowl and these representations should be read in conjunction with the representations submitted to the Highgate Neighbourhood Forum (HNF) in March 2015, and NHSPS's separate representations submitted to Draft Policy DM 58.
- 1.5 NHSPS is currently considering how part of the site (Plot C as shown at **Appendix B**) could be redeveloped to deliver a small mixed-use scheme, which could enable the provision of new high quality residential and community space.
- 1.6 In summary, the three draft Local Plan documents are broadly consistent with national and regional policy, however changes are required to all three documents in order to ensure that they are sound. These proposed modifications are not of a fundamental nature nor would they change the overall spatial strategy of the Local Plan. Modified policy text is suggested where appropriate.

2. Background to the Site

Site and Surroundings

- 2.1 The site, owned by NHSPS, is leased to THS who operate as a charity to provide horticultural and teaching therapy and training for youths and young adults with learning difficulties and disabilities.
- 2.2 The lower part of the site (labelled as Plot A and B at **Appendix B**) accommodates land used for the growing of plants and includes a number of polytunnels associated to this use. Plot C (also identified at **Appendix B**) currently accommodates the main teaching facilities, including a number of single and two storey buildings, including sheds, glasshouses and administrative accommodation. There is also a walled garden. Access into the site for vehicles and pedestrians is from a private drive off Cholmeley Park.
- 2.3 The general character of the northern, eastern and southern surroundings of the site is residential properties and their curtilages. To the west of the site is the wider Highgate Bowl area which comprises relatively undeveloped land including woods and a former garden centre.

Designations – Adopted and Emerging

- 2.4 Within adopted LBH policy, the whole site is designated within the Highgate Conservation Area, with parts of Plots A and B, but not C, designated as a Local Site of Importance for Nature Conservation (SINC).
- 2.5 Within emerging policy, LBH's draft Site Allocations (SA) DPD (January 2014) included Plot A and Plot B, but excluded the whole of Plot C, within draft Allocation HG4: which relates to the Highgate Bowl area, however LBH's latest draft iteration of the SA DPD (February 2015) includes the whole site within draft Site Allocation SA45: Highgate Bowl where the principle of limited residential development around the fringes of the Bowl area namely at Duke's Yard and Townsend Yard are referenced. Plots A, B and part of Plot C (but excluding the existing built form and including the walled garden only) are also currently identified within the draft SA DPD as Significant Local Open Land (SLOL). These representations provide comment on these draft designations in greater depth later in this document.
- 2.6 It should also be noted that the site is identified within the Highgate Bowl Key Area within the emerging Highgate Neighbourhood Plan, published for public consultation in January 2015.

NHSPS Involvement and Responsibility

- 2.7 To date, NHSPS have not been actively involved in the drafting and development of the emerging Local Plan documents however as a landowner within a draft Allocation as part of the emerging SA DPD, they are keen to be engaged.
- 2.8 NHSPS is currently reviewing whether a small scale mixed use development, including residential and community uses could be accommodated on Plot C.

3. Draft Alterations to Strategic Policies

Introduction

- 3.1 In this section of the representations, comments are made in response to the Local Plan: Alterations to Strategic Policies Document (February 2015).
- 3.2 We understand that the purpose of the draft Alterations are to bring the document in line with updated policy, guidance and evidence base work; principally:
- The publication of the Further Alterations to the London Plan (FALP) (March 2015);
 - Changes to the National Planning Practice Guidance (ongoing but correct as of 17th March 2015); and
 - Updated key local evidence base studies.
- 3.3 On the basis of the above, we understand and acknowledge that the draft Alterations do not seek to fundamentally alter the strategy as set out within the adopted Local Plan: Strategic Policies Document.
- 3.4 Accordingly, these representations do not wish to make significant comments on the consultation document, however responses are provided below in connection with a number of alterations focussed around the proposed revisions to adopted Policy SP1 in connection with housing target increases and areas of growth.
- 3.5 In order to ensure consistency within the draft Alterations and to ensure that the proposed alterations are prepared soundly and in accordance with national planning policy and guidance, modifications are proposed for Policy SP1.

Alt6, Alt27, Alt30, Alt46, Alt 54 and Alt 55

- 3.6 Alterations 6, 27, 30, 46, 54 and 55 all seek to update the overall minimum housing target for LBH from 820 dwellings per annum (dpa) to 1,502 dpa and aim towards the higher total strategic housing requirement of 19,800 as identified in the Haringey Strategic Housing Market Assessment.
- 3.7 This significant housing target increase is necessitated by the revision to the housing target for LBH set by the Greater London Authority (GLA) within the FALP. This increase to the housing target is from in accordance with the NPPF's requirements to plan to meet the objectively assessed needs for housing and boost significantly the supply of housing and therefore general support is given for the increased housing target within the draft Alterations.
- 3.8 In accordance with Alt21, as discussed below, a minor amendment is suggested to the last paragraph of SP1: Managing Growth to reflect that modest housing growth will take place within areas such as Muswell Hill Area Neighbourhood, including Highgate, which was previously identified as an Area of Limited Change.

- 3.9 Accordingly, it is suggested that the wording of Policy SP1: Managing Growth is updated to read as follows¹ in order to make Policy SP1 sound and in accordance with the overall content of the draft Alterations:

“SP1: Managing Growth

...

*Parts of the borough outside of the Growth Areas and Areas of Change will experience some development and change **in contributing towards meeting the local development needs, including providing for new homes.** The Council will ensure that development in these Areas of ~~Limited~~ **Moderate** Change will respect the character of its surroundings and provide environmental improvements and services.”*

Alt21

- 3.10 Alteration 21 seeks to amend the strategy for the Muswell Hill Area Neighbourhood, which includes the Highgate area, to allow for modest growth on brownfield regeneration and infill sites to provide a range of housing accommodation.
- 3.11 In light of the significantly increased housing target for LBH as set by the FALP, these representations are in general support of this strategy as additional land, both in the form of identified sites and as small windfall sites, will be required to be developed for housing during the plan period to meet this local need. This approach accords with the NPPF's (paragraph 14) presumption in favour of sustainable development and its requirement to boost significantly the supply of land for housing (paragraph 47), as well as prioritising the redevelopment of brownfield land to meet these objectives, where possible.

Other Alterations

- 3.12 These representations do not wish to comment on the other parts of the draft Alterations document.

¹ Suggested deletions are indicated via ~~strikethrough~~, with new text proposed in **bold**.

4. Draft Site Allocations DPD

Introduction

- 4.1 In this section of the representations, comments are made in response to the Draft Local Plan: Site Allocations DPD (February 2015).
- 4.2 It is understood that the purpose of the draft SA DPD is to allocate strategic sites which will make a significant contribution to meeting the growth aspirations set out in the Local Plan.
- 4.3 The comments made within these representations on the draft SA DPD relate only to Draft Allocation SA45: Highgate Bowl, which includes the entirety of the NHSPS site. The whole of Plot A, Plot B and the walled garden area of Plot C are also identified by Draft Allocation SA45 as Significant Local Open Land (SLOL).
- 4.4 As noted in Section 2 above, the previous draft of the SA DPD, published in January 2014, included a revised version of draft Allocation SA45 under the reference of draft Allocation HG4. Draft Allocation HG4 identified Plot A and Plot B within the boundary of the allocation, but excluded the whole of Plot C.
- 4.5 These representations propose a number of changes to Draft Allocation SA45 in order to ensure that the policy is consistent with the rest of the adopted and emerging Local Plan and emerging Highgate Neighbourhood Plan, and sound in terms of national planning policy and guidance.

Commentary on Draft Allocation SA45: Highgate Bowl

Land Uses

- 4.6 Aside of identifying a large part of the draft Allocation as open space, which is discussed in greater depth below, the emerging policy also supports the principle of some residential development within the boundaries of the allocation, focussed towards Townsend and Duke's Head yards.
- 4.7 Within the previous draft of the SA DPD (January 2014), there was support for residential development along the fringes of the allocation to provide circa 4,500sqm residential in total.
- 4.8 The previous wording of the policy was more flexible than the current draft, and indeed more appropriate in light of the increasing FALP housing target for Haringey and the NPPF's presumption in favour of sustainable development.
- 4.9 To provide more flexibility and ensure that small scale, new residential development could and should be delivered in this area on brownfield sites (other than the two yards) at fringe locations to the Bowl to include Plot C of THS site.
- 4.10 Proposed revisions to the wording of the draft Allocation are proposed below.

Significant Local Open Land

- 4.11 These representations are in general support for the preservation and protection of the open space character of the Highgate Bowl, however concerns are raised about the designation and

boundaries of the proposed Significant Local Open Land within the boundary of draft Allocation SA45.

- 4.12 As raised below in connection with draft Policy DM26: Open Space, SLOL is not one of the open space typologies identified within FALP Table 7.2, nor is an adequate definition provided in any adopted or emerging regional or local policy. There also does not appear to be any evidenced recommendation for the designation of a large part of the Bowl area as SLOL.
- 4.13 Whilst the part of Plot C that currently accommodates the buildings associated to THS is excluded from the SLOL designation, the walled garden, which is essentially a private garden with built footprint within it, and the grass verges on the southern side of the access road are included.
- 4.14 Notwithstanding the lack of definition of what constitutes SLOL, the walled garden (which is not available to the public) and the grass verges do not make the same contribution to the protection of open space as the main area within the Bowl and these should be removed from the proposed designation.
- 4.15 The difference in character and function of Plot C, in comparison to the Plots A and B and the wider Bowl area, is emphasised by the fact that in the previous version of the draft SA DPD, published in January 2014, it was not even included within the boundary of the draft Allocation, which was then known as HG4.
- 4.16 On the basis of the comments made above, a revised map is included for draft Allocation SA45 at **Appendix C** which indicates the altered boundary for the SLOL designation within the Bowl area. No other changes have been made.

Access Through the Bowl

- 4.17 One of the site requirements set out for draft Allocation SA45 states that “*public routes though the various land parcels that make up the Bowl will need to be introduced to unify the open space*” and indicative routes are shown on the draft Allocation plan. This includes access into the Bowl through the site via Cholmeley Park.
- 4.18 Whilst these representations support the general principle of improving pedestrian and cyclist access through the Bowl area acknowledging the benefits that this could provide to the wider area, the aspirations and operational requirements of THS will need to be taken into account.
- 4.19 A permanent pedestrian and cycle through-route could have a significant effect on the character and security of the site for the continuation of the existing community use (THS), if it were to run through the site.

Proposed Modifications to Draft Allocation SA45: Highgate Bowl

- 4.20 On the basis of the comments made above, and in addition to the graphical modifications proposed at **Appendix C**, the following modifications are proposed to ensure that the policy is sound and consistent with national, regional and local planning policy.

“SA 45: Highgate Bowl

...

Proposed Site Allocation

*Protection of the Highgate Bowl as open space, and improvement of public access to it through ~~it through~~ with limited **residential** redevelopment of Townsend and Duke's Head yards and at **The Harington Scheme site, as brownfield sites at fringe locations to the Bowl.***

...

Site Requirements

- *The buildings facing the High Street, and their burgage plots should be retained.*
- *Highgate Bowl itself will be redefined as Significant Local Open Land.*
- *Limited redevelopment of the garages and workshops in the two yard areas ~~will be allowed~~ and at the built area of **The Harington Scheme site to create a range of house types to include flats and mews-style residential development.***
- *Height will be limited to 4 storeys on the yards section of the site.*
- *Enhanced access to the Bowl will be provided through the arch of Duke's Head Yard, and through Townsend Yard.*
- *Public routes through the various land parcels that make up the Bowl will need to be introduced to unify the open space, **subject to the operational requirements of existing landowners and/or occupiers.***
- *The site lies within the Highgate Conservation Area and development should preserve or enhance its appearance as per the statutory requirements.*

Development Guidelines

- *Heights should be subsidiary to those on the High Street, being generally up to 3 storeys, with some higher points of 4 storeys following the precedent of "The Studio" site.*
- *Due to the proximity of public amenity offered by the newly designated open space, development can occupy most of the available space, reflecting a mews-typology **and flat-led schemes.***
- *The entrances to the yard roads should signal the open space behind, with a visual link established where feasible.*
- *New users of the open space will be encouraged, while generally keeping it open for public use.*
- *Part of the site has a Local SINC designation, and this should be protected.*
- *Thames Water should be consulted with regards **to the** capacity of existing drains to move waste water from the site, Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition of planning consents.*

- *In line with policy SP9, if redevelopment results in a net loss of employment floorspace, a financial compensation will be required as set out in the Planning Obligations SPD **where viable.***
- *Studies should be undertaken to understand what potential contamination there is on the yards portion of the site prior to any development taking place.”*

5. Draft Development Management Policies DPD

Introduction

- 5.1 In this section of the representations, comments are made in response to the Draft Local Plan: Development Management Policies DPD (February 2015).
- 5.2 We understand that the purpose of the draft DM DPD is to supplement the Strategic Policies and provide more detailed guidance for the determination of planning applications.
- 5.3 These representations respond to a number of the draft DM policies and a number of modifications are required to ensure that the document is sound and consistent with national and regional policy. Suggested modifications to policy text are offered where appropriate.

Draft Policy DM3: Privacy and Protection from Overlooking and Draft Policy DM18: Housing Design and Quality

- 5.4 The NPPF (paragraph 56) "*attaches great importance to the design of the built environment*", going on to state that "*good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*".
- 5.5 FALP Policy 3.5 also seeks a good quality of design in new residential development.
- 5.6 In discussion of separation distances, the Mayor's Housing Design Guide (2010) states that in the past planning guidance for privacy has been concerned with achieving visual separation between dwellings "*by setting a minimum distance of 18-21m between facing homes*." Whilst these are still useful guidelines, it goes on to state that "*adhering rigidly to these measures can limited the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density*."
- 5.7 Draft Policy DM3 seeks to secure good design and appropriate residential privacy by requiring a minimum separation distance of 20m between facing 1st floor windows of neighbouring homes, and draft policy DM18 seeks that all new housing must be of a high quality, taking account of the privacy and amenity of neighbouring uses.
- 5.8 Accordingly, whilst general support is given for draft Policy DM18 and the aspiration to deliver high quality residential accommodation that offers privacy for residents and neighbouring properties, these representations object to the setting of a minimum separation distance of 20m. In line with the guidance within the Mayor's Housing Design Guide the setting of minimum separation distances can unduly restrict developed. In urban locations, such as London, there are a host of design measures that can be incorporated into schemes to ensure good quality residential amenity at separation distances of significantly lower than 20m, including opaque glazing and angled window openings.
- 5.9 In accordance with the comments made above, draft Policy DM3 should be amended as follows to ensure that it is sound:

"Policy DM3: Privacy and Protection from Overlooking

- A. *All dwellings should provide a reasonable amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the*

~~development, including a distance of no less than 20m between facing 1st floor habitable room windows of neighbouring homes.~~

Draft Policy DM16: Housing Supply

- 5.10 As noted above in connection with the draft Alterations to the Strategic Policies, the NPPF clearly supports a presumption in favour of development, except where this would go against principles of sustainability. Paragraph 49 (of the NPPF) emphasises that *“housing applications should be considered in the context of the presumption in favour of sustainable development.”*
- 5.11 Furthermore, the importance of delivering new homes is a key theme of the NPPF, stating that authorities should have a clear understanding of housing needs in their area (paragraph 159) and should seek to *“boost significantly the supply of housing”* (paragraph 47).
- 5.12 The FALP sets a new minimum housing target for LBH between 2015 and 2025 of 15,019 which equates to a minimum annual delivery rate of 1,502.
- 5.13 Draft Policy DM16 pledges support for residential development on sites that are allocated within the SA DPD and on windfall sites, where this complies with all other relevant policies within the Local Plan.
- 5.14 These representations are therefore in general support of draft Policy DM16 in acknowledging both the role that allocated sites and windfall sites have in meeting and exceeding minimum housing targets, and therefore no amendments are required to this policy.

Draft Policy DM17: Housing Mix

- 5.15 The NPPF (paragraph 50) requires the delivery of a wide choice of high quality homes.
- 5.16 The FALP (Policy 3.5) acknowledges that in the design of new housing developments a range of factors should be considered including local character, density, tenure, land use mix and relationship to open space.
- 5.17 Draft Policy DM17 states that proposals for new residential development, including mixed-use schemes comprising residential accommodation, should provide a mix of housing having regard to a) individual site circumstances including location, character of its surrounds, site constraints and scale of development proposed, b) the target mix for affordable housing, c) the priority for affordable family housing, d) the need to optimise housing outputs and the need to achieve mixed communities.
- 5.18 It also supports the use of the London Plan policies on residential density and states that mono-tenure developments or proposals which contain a mix exclusively made up of 1 or 2 bedroom units will not be supported unless they are part of larger developments or within neighbourhoods where such provision would help to address existing imbalances with regard to housing choice.
- 5.19 These representations give general support within draft Policy DM17 to acknowledging and accounting for individual site circumstances and density ranges in line with the FALP, however restricting the development of blocks containing only 1 or 2 bedroom units is inconsistent with the national and regional policy noted above. In particular locations, local housing demand, scheme viability, site constraints and the character of the surroundings will mean that the residential development proposing only 1 or 2 bedroom units is the most appropriate and optimal use of the site, and should therefore be supported on the merits of the application

proposals themselves rather than applying a perspective policy which might inhibit development coming forward.

- 5.20 In accordance with the comments made above draft Policy DM17 should be amended as follows to ensure that it is sound and consistent with other parts of draft Policy DM17 as well as national and regional policy:

“Policy DM17: Housing Mix

...

~~C. The Council will not support mono-tenure developments or proposals which contain a mix exclusively made up of 1 or 2 bedroom units unless they are part of larger developments or within neighbourhoods where such provision would help to address existing imbalances with regard to housing choice.~~

...”

Draft Policy DM26: Open Space

- 5.21 NPPF (paragraph 73) states that planning policies relating to protection of designated open space should be based on robust and up-to-date assessments of the needs for open space, sport and recreation facilities and opportunities for new provision.
- 5.22 The FALP (Policy 7.18) states that when assessing local open space needs, local authorities should include appropriate designations and policies for the protection of open space to address deficiencies, and identify areas of open space deficiency, using the open space categorisation set out in Table 7.2 as a benchmark.
- 5.23 Draft Policy DM26 states that permission will not be granted for proposals that would result in the loss of open space (implying both designated and undesignated, with or without public access), unless an assessment has been undertaken which shows that the open space is surplus to all the functions that an open space can perform. It goes on to state that the Council will only grant planning permission for small-scale structures on public open space (including SLOL) where the development is directly related and ancillary to any recreational use of the land and the predominant open character of the open space is maintained. Development adjacent to open space should seek to protect and enhance the value and visual character of the open land.
- 5.24 First, there is not adequate definition or evidential justification supporting the draft designation of SLOL (to include the definition of its boundaries). Furthermore, SLOL is not a type of open space as identified within FALP Table 7.2. In particular there are small areas (namely the walled garden area at THS, Highgate) which are included within this wider draft designation but which are not publicly accessible open spaces, nor have they been identified as having any local open space value in any recent evidence base documents. On this basis, and in connection with draft Allocation SA45, these representations have made suggested modifications to the boundaries of the SLOL designation.
- 5.25 Second, draft Policy DM26 is too restrictive in requiring open space assessments to justify the loss of undesignated open space due to the fact that 1) designated open space areas where LBH have undertaken an open space assessment and concluded they are areas of open space value would remain protected, and 2) undesignated open space with no public access is likely to be of limited open space value anyway and would have been discounted by LBH in previous

assessment. The impact of the current wording could therefore unnecessarily delay or prevent development proposals from coming forward.

- 5.26 Further, nowhere in draft Policy DM26 is there mention of any consideration given to the replacement or enhancement of existing open space provision as part of a development scheme which is likely to provide for better quality and better used open space provision. Development proposals that enhance existing open space areas should be actively supported to include where small scale development is directly related to an existing land use provided it does not undermine the character or use of the open space.
- 5.27 In accordance with the comments made above, draft Policy DM26 should be amended as follows:

“Policy DM26: Open Space

- A. *The Council will not grant planning permission for proposals for development that would result in the loss of **public** open space, unless an assessment has been undertaken which shows that the open space is surplus to all the functions that an open space can perform **or the development is directly related to an existing land use within the open space.***
- B. *The Council will require all residential development proposals in Areas of Open Space Deficiency (see map 4.1), and in wards which fall below the Borough-wide target of open space of 1.64ha per 1,000 population (see map 4.2) to provide new open space and/or make financial contributions to enable the provision of new open spaces or improvements to the accessibility and quality of existing open space **where viable.***
- C. *The Council will only grant planning permission for small-scale structures on Designated Public Open Space (Green Belt, Metropolitan Open Land, Significant Local Open Land or Lee Valley Regional Park as shown on the Proposals Map) where the development is directly related and ancillary to any recreational or **other existing** use of the land and the predominant open character of the open space is maintained.*
- D. *The Council supports the provision and improvement of outdoor open space and leisure facilities. Small scale ancillary developments which enhance the park and open space offer, such as refreshment facilities, public conveniences, public art installations or outdoor play and fitness equipment, will be permitted, provided that they are:*
- a. Of a high standard of design and quality, safe and accessible to all;*
 - b. Not have a detrimental impact on nature conservation and biodiversity;*
 - c. Not adversely detract from the overall function, character and appearance of the park or open space.*
- E. *Development adjacent to open space should seek to protect and enhance the value and visual character of the open land.”*

- 5.28 It is also recommended that LBH include a definition of SLOL within the emerging DPD, however this should be defined by LBH. Any land that is considered for designation as SLOL should be identified through evidenced assessment.

Draft Policy DM43: Parking

- 5.29 The FALP (Policy 6.13) states that maximum car parking standards (as set out in Table 6.2) should be the basis for considering planning applications. In locations with high public transport accessibility, car-free developments should be promoted.
- 5.30 Draft Policy DM43 states that development proposals will be assessed against the standards for car and cycle parking set out in the London Plan, and that the Council will strongly encourage contributions to car club schemes or the provision of car club bays as an alternative to on-site car parking. It goes on to state that the Council will support proposals for new development with limited or no on-site parking where there are a) alternative and accessible means of transport available, b) public transport accessibility is at least 4, c) a controlled parking zone exists, d) parking is provided for disabled people and e) parking is designated for occupiers of developments specified as car capped.
- 5.31 These representations support the principle of providing less than the maximum car parking standards as set out by the London Plan and also support the aspiration to encourage contributions towards car club schemes in lieu of on-site car parking.
- 5.32 Accordingly, no proposed amendments are suggested for this policy.

Other Policies

- 5.33 These representations do not wish to comment specifically on any other draft policies within the Draft DM DPD.

6. Conclusions

- 6.1 The general strategy within the three Local Plan documents is broadly sound, however suggestions have been made throughout these representations where modifications are required to ensure consistency with other parts of the Local Plan as well as conformity with national and regional planning policy and guidance.
- 6.2 In summary, within the draft Alterations to Strategic Policies, modifications are required to draft Policy SP1.
- 6.3 Within the draft SA DPD, no objection is raised to the inclusion of the whole of the site within the boundary of draft Allocation SA45, however modifications are proposed to allow limited residential development on plots within the designation, where previous development has already occurred. An amended boundary for the SLOL designation is also proposed to exclude the whole of Plot C to reflect its limited open space value with no public access.
- 6.4 Again, minor amendments are suggested to a number of emerging DM DPD policies, most importantly in connection to privacy and overlooking, housing mix and open space.
- 6.5 NHSPS to be engaged as the draft Local Plan develops.