

3 March 2016



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By email submission ldf@haringey.gov.uk

Dear Sir/ Madam,

**Site Allocations Development Plan Document (DPD)
Pre-Submission Version for Consultation (January 2016)**

Savills has been instructed by NHS Property Services Ltd (NHSPS) to prepare and submit planning representations in response to the Pre-Submission Version of the Haringey Site Allocations Development Plan Document (January 2016), with specific reference to its land interests at 55a Cholmeley Park in Highgate (a site plan is attached at **Appendix 1**) which is currently leased to The Harington Scheme (THS). These comments follow earlier planning representations submitted to the Preferred Options version of the Site Allocations DPD (SA DPD) during March 2015. NHSPS' earlier representations to the SA DPD are also attached at **Appendix 2**.

In summary, the draft Local Plan document is broadly consistent with national and regional policy, however changes are required to the document in order to ensure that it is 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.

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. The comments made within these representations on the draft SA DPD relate only to Draft Allocation SA42: Highgate Bowl, which includes the entirety of the NHSPS site, which is also identified within the SA DPD as Significant Local Open Land (SLOL).

These representations propose a number of changes to Draft Allocation SA42 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.

It should also be noted that our previous comments relating to the draft Strategic Policies and Development Management DPD have not been addressed within the newly published draft versions of these documents. These representations still stand and we would urge the Council to reconsider them.

Commentary on Draft Allocation SA42: Highgate Bowl

Land Uses

Aside from identifying 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.

Within the previous draft of the SA DPD (February 2015), there was support for residential development along the fringes of the allocation to provide circa 4,500sqm residential in total. To provide more flexibility and ensure that small scale, new residential development can be delivered on fringe location brownfield sites (other than on the two yards), these fringe locations should include the built up area of the NHSPS site. Accordingly, proposed revisions to the wording of the draft Allocation are proposed below. Flexibility is required within this policy wording in order to maximise the designation of suitable land for housing development in accordance with the FALP's increasing housing target for Haringey and the NPPF's presumption in favour of sustainable development.

Significant Local Open Land

These representations are in general support of 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 SA42.

As raised below, 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.

Within the Preferred Options SA DPD, whilst the part of site that currently accommodates the buildings associated to THS was 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 were included within the SLOL designation.

Under the Pre-Submission draft SA DPD, such a boundary distinction is not made, with the text of the policy stating that 'Highgate Bowl itself will be redefined as Significant Local Open Land'. The map within draft Allocation SA42 removes the previous green boundary line that distinguished between the SLOL designation and the fringe areas of the bowl that may be suitable for modest development.

The removal of this boundary is inconsistent with the second draft Neighbourhood Plan, which under its policy for Key Site 3 (Highgate Bowl) outlines a clear boundary demarking fringe areas for future development from the wider open land area of the Bowl that is to be protected. It is therefore suggested that the submission version of the SA DPD includes a clear definition of the boundaries of the SLOL and the developable fringe areas, in accordance with the emerging Neighbourhood Plan.

As described under our previous representations, the built up area of the NHSPS site should be clearly removed from the SLOL designation. 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 therefore be removed from the proposed designation.

The difference in character and function of the built up area, walled garden and verges, in comparison to the wider areas of the NHSPS site within the Bowl area, is emphasised by the fact that in the first version of the draft SA DPD, published in January 2014, did not even include the built up area, walled garden and verges within the boundary of the draft Allocation, which was then known as HG4.

On the basis of the comments made above, a revised map is included for draft Allocation SA42 at **Appendix 3** which indicates the altered boundary for the SLOL designation within the Bowl area, removing the fringe developable areas of the Bowl. No other changes have been made.

Access Through the Bowl

One of the site requirements set out for draft Allocation SA42 states that “*public routes through the various land parcels that make up the Bowl will need to be introduced to unify the open space*”. This includes access into the Bowl through the site via Cholmeley Park.

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 or another suitable user will need to be taken into account. A permanent pedestrian and cycle through-route might have a significant effect on the character and security of the site for the continuation of the existing or new community use, if it were to run through the site. It is noted that these routes are no longer indicated on the site plan under draft Allocation SA42 and we are supportive of this.

Proposed Modifications to Draft Allocation SA42: Highgate Bowl

On the basis of the comments made above, and in addition to the graphical modifications proposed at **Appendix 3**, the following modifications are proposed to ensure that the policy is sound and consistent with national, regional and local planning policy.

“SA 42: Highgate Bowl

Proposed Site Allocation

*Protection of the Highgate Bowl as open space, and improvement of public access ~~to it through~~ **with limited residential** redevelopment of Townsend and Duke’s Head yards **and at the built up area of The Harington Scheme site, as brownfield sites at fringe locations to the Bowl as identified on the site plan for SA42.***

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. This should not involve the loss of employment floorspace on 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

- *Where new development takes place, heights should be subsidiary to those on the High Street, **being generally up to 4 storeys following the precedent of "The Studio" site at Duke's Head Yard.***
- *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, it will be expected to be re-provided on site, where possible, or 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."*

Conclusion

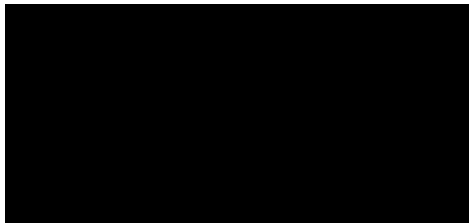
The general strategy within the DPD document is broadly sound, however suggestions have been made throughout these representations where modifications are required to ensure consistency with other parts of the Local Plan as well as conformity with the emerging Neighbourhood Plan, national and regional planning policy and guidance.

Within the draft SA DPD, no objection is raised to the inclusion of the whole of the site within the boundary of draft Allocation SA42, however modifications are proposed to allow limited residential development on plots within the designation, where previous development has already occurred. A clarification on the boundary for the SLOL designation is also required to exclude the built area of the NHSPS site to reflect its very limited open space value with no public access.

We trust this submission provides sufficient information however should you require any further information or clarification, please do not hesitate to contact me.

We look forward to hearing the Council's responses to these further representations.

Yours sincerely



Jane Barnett
Director
Planning