

4<sup>th</sup> March 2016



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Dear Sirs,

**HARINGEY LOCAL PLAN CONSULTATION – PRE SUBMISSION, JANUARY 2016  
DRAFT SITE ALLOCATIONS – DRAFT SA55: COPPETTS WOOD HOSPITAL  
PLANNING REPRESENTATIONS ON BEHALF OF CATALYST HOUSING GROUP**

On behalf of our client, Catalyst Housing Group (CHG), we submit formal planning representations in response to the Council's draft Site Allocations DPD, specifically to draft Policy SA55 concerning the draft allocation of Coppetts Wood Hospital (CWH). CHG are the freeholders of the site having acquired the property from the NHS.

We object to the following points identified in draft SA55:

1. The site's assumed PTAL 1 rating.
2. The cited net development capacity of 21 units across the former hospital site and former school.
3. That both the former hospital and school sites are being considered together as a single allocation.
4. The citing of testing for hospital uses on the CWH part of the site.
5. The citing of the retention of the mortuary building within the CWH site.

For clarification purposes, under the site description "*current/ previous use*" CWH should be referred to as a "*former*" hospital given the site has been redundant now for many years, since 2000.

**1. The Site's PTAL Status**

Within the Site Allocations DPD, the site's PTAL rating is incorrectly cited as PTAL rating 1. The PTAL rating is based on the site's accessibility to a range of public transport modes (bus, rail and tube), which are discussed below and which draws from transport advice taken from CHG's appointed transportation consultations who have undertaken a specific PTAL analysis.

There are a range of local facilities within Muswell Hill that are within an acceptable walking and cycling distance with the local infrastructure supporting safe and convenient movement. Furthermore, Finchley, Barnet and Highgate are all within an acceptable cycling distance with suitable, supporting infrastructure.

The nearest bus stops are the Coppetts Wood Hospital bus stops located on Coppetts Road, just beyond the eastern site boundary. These bus stops offer Route 234, which operates between Barnet and Highgate providing regular daily services. An additional four services can be accessed along Colney Hatch Lane, within an easy walking distance of the site and along well-lit routes.

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New Southgate Rail Station is approximately 2.2 kilometres east of the site in addition to Alexandra Palace, approximately 2.5 kilometres to the east. These stations offer three trains an hour in either direction including services to central London.

With regards to the London Underground Network, the site is located centrally to multiple stations offering services along the Northern and Piccadilly Lines. The nearest London Underground station is East Finchley, a Northern Line Station operating between High Barnet and Morden offering fast connections to key locations in central London. East Finchley Station is within a 2.6 kilometre walking distance of the site. Alternatively, the Route 234 bus provides a direct connection from the site to the station.

It is therefore concluded that the site is readily and safely accessible by foot and cycle to local services, as well as being accessible to fast and frequent public transport services linking with wider destinations that provide excellent access to employment, education, healthcare and retail. There can be no doubt, therefore, that the site has a PTAL 2 rating at this location based on its public transport accessibility. Planning approvals in the past for residential redevelopment at the CWH site had been consented on the basis of the site benefiting from a PTAL 2 urban setting and thus alteration to draft Policy SA55 should be amended to reflect this.

## 2. The Proposed Net Residential Development Capacity

For a site with a PTAL 2 rating and within an urban location (such as CWH), the London Plan density matrix recommends a range between 200-450 habitable rooms per hectare.

Of relevance, the planning permission granted at Coppetts Wood Hospital in 2010 (referenced HG/2008/2196) was approved on the basis of an officer's report at the time citing that the "*London Plan sets densities for development in urban areas and recommends a density range of 450-700 habitable rooms per hectare. Policy HSG9 states that residential development in the borough should normally be provided at a density of between 200-700 habitable rooms per hectare*" which relates to a higher density range than the above London Plan guidelines. For the avoidance of doubt, this approved scheme concerned the hospital site only. .

Draft Policy DM11 of the Pre-Submission Development Management DPD (January 2016) states that "*the Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach.*" The London Plan (2015) identifies that the density matrix are guidelines only and should not be applied mechanically where a design led approach should be taken with again the aim to optimise housing potential. Furthermore, one of the core planning principles within the NPPF (paragraph 17) is the need to encourage the effective use of land by re-using land that has been previously developed (i.e. brownfield land such as the former hospital site).

In view of the above, we strongly object to the cited net development capacity of 21 units across the former hospital site and former school. This density of development is entirely contrary to adopted and emerging local policy and would fail to optimise the site's development potential which is contrary to draft Policy DM11, London Plan policy and the NPPF/ NPPG guidelines.

We therefore recommend that a density range of 200-450 habitable rooms per hectare is cited for the site's development capacity in relation to the CWH part of the site only, in line with adopted and emerging policy.

## 4. Single Allocation

It is unclear as to why both the former hospital and school sites are being considered together as a single allocation. The sites are under separate ownership and the former hospital site, which is owned by CHG, is vacant and has been for the many years. We understand the school site is currently in use and likely to be retained in education use.

The sites should, therefore, be considered individually and the timeframe for delivery of the former hospital site should be cited as deliverable within the next five years (2015-2020).

#### 4. Testing Hospital Use

Our comments in this respect relate to the former hospital site only, which is within CHG's ownership.

There is no dispute that residential redevelopment is acceptable on the site. The site has been vacant for many years and there has been no interest in it for continued hospital use. The site has a planning history of recent planning permissions which establish the residential land use; and in particular the Council granted planning approval in 2010 for the change of use to residential to provide 55 dwellings, where it was cited within the officer's report that *"The Royal Free Hampstead NHS Trust seeks to transfer its unit at the Coppetts Wood hospital a former infectious disease hospital closer to the Royal Free Hospital. As such the site provides the opportunity to provide much needed new housing in the Borough."*

In the light of the above, it has already been established that there is no demand for the continued use of the site as a hospital and that residential development, a priority use, is acceptable. We therefore recommend that this is reflected in draft SA55.

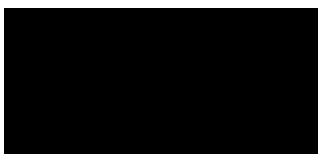
#### 5. Retention of Mortuary Building

On behalf of CHG, Turley Associates have undertaken an independent Heritage Assessment which concludes that the mortuary building does not contain any special architectural or historic interest in the national or local context.

Retaining the mortuary building would create design difficulties in bringing forward a viable residential redevelopment of the site forward to optimise its housing potential at this important site location. This aspect is also a specific, detailed matter which requires evidential justification at the planning application stage and is not in our view a consideration for draft policy S55 without the Council providing their own evidence to support the statement. We propose this matter is dealt with correctly through the planning application process.

Should you have any queries, please do not hesitate to contact me or alternatively my colleague, Anthony Frendo (on 020 7299 3048 and/or [afrendo@savills.com](mailto:afrendo@savills.com)).

Yours sincerely



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