



Our Ref: TJ/18650

Local Plan Consultation  
Planning Policy  
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26<sup>th</sup> March 2015

Dear Sirs,

**HARINGEY'S LOCAL PLAN  
DEVELOPMENT MANAGEMENT POLICIES PREFERRED OPTIONS  
CONSULTATION DOCUMENT  
REPRESENTATIONS ON BEHALF OF CATALYST HOUSING**

On behalf of our client, Catalyst Housing, we submit the following representations in relation to the Development Management Policies Preferred Options consultation.

**Policy DM3: Privacy and Protection from Overlooking**

Although we acknowledge the requirement to provide a 20m separation distance between facing 1<sup>st</sup> floor habitable room windows, we strongly question the requirements within supporting para. 2.20.

Para. 2.20 requires an additional distance of 10m for each additional floor i.e. a minimum of 30m between facing 2<sup>nd</sup> floor habitable room windows etc. We are of the opinion that such additional requirements are both onerous and unnecessary to protect privacy and overlooking. Such distances will render a number of development sites within an urban context undeliverable and will also adversely impact on the delivery of appropriate high density schemes.

A general rule of 18m – 20m between facing habitable rooms is appropriate to protect existing residents and overlooking and any other requirements are considered to be onerous and excessive.

**Policy DM58: Managing the Provision of Community Infrastructure**

We note the requirements of this policy in terms of the protection of existing social and community facilities (such as hospitals), and that there is a process through which a release and redevelopment or change of use of such accommodation will need to be tested to provide appropriate justification.

This is particularly relevant to a site on which we have made representations in terms of proposed Site Allocation SA56 (Coppett's Wood Hospital).

This particular facility is a former high security unit for infectious diseases and has been vacant since 2008. It is now being disposed of by the NHS Trust. There are occasions when evidence of need for a particular facility or the fact that it cannot be utilised for other community purposes (because of its size, configuration and so on), can be demonstrated clearly without the need for a 12 month marketing period (as set out in criteria c). This is particularly pertinent for large estate rationalisations, especially health facilities where the clear reason for closure, lack of adaptability and requirement for wholesale redevelopment (subject to heritage) is clear and should not be held up by irrelevant marketing requirements. It is appreciated that this would be on a case by case basis, but this flexibility should be inserted within the policy or made clear in the supporting text at least.

We trust that the above comments will be considered in full. If there are any queries or if additional information is required, please do not hesitate to contact Karen Jones on the above details.

Yours faithfully

**CgMs**

For and on behalf of Catalyst Housing