

Local Plan Consultation Planning Policy Haringey Council River Park House 225 High Road Wood Green London N22 8HO

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27th March 2015

Dear Sirs,

HARINGEY'S LOCAL PLAN SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT PREFERRED OPTIONS CONSULTATION DOCUMENT REPRESENTATIONS ON BEHALF OF CATALYST HOUSING

On behalf of Catalyst Housing we submit the following representations to the Preferred Options Site Allocations Development Plan Document and specifically to site SA 56 Coppetts Wood Hospital.

SA 56: Coppetts Wood Hospital

We have the following specific comments on the above site allocation:

- We recommend that the site diagram on page 150 is clarified to include a key with the diagram rather than only providing a generic key at the back of the document. This will make the diagram easier to read and understand.
- The red line site allocation relates to a number of individual uses and ownerships namely: Coppetts Wood Hospital, Greenfield School and Crouch End Vampires (football changing facilities). Although these uses are geographically adjacent there is no linkage between these facilities in terms of ownership or operations.

The policy wording as currently drafted is confusing and ambiguous in relation to redevelopment options and site boundaries.

We recommend that in the first instance the red line plan should differentiate between these uses and ownerships.

 The Proposed Site Allocation on page 150 refers to the 'Consolidation of existing land uses to create potentially mixed use development'

The above statement is again ambiguous and does not provide clear development guidelines. As noted above, the three existing uses on the site do not have any synergies and we have serious concerns about the deliverability of development at Coppetts Wood Hospital if the Council's



intention is to seek comprehensive development, and the consolidation of other existing land uses, within the wider red line.

We strongly disagree with any aspirations for the comprehensive development of the site and consider this would stifle and delay development. The Coppetts Wood Hospital site has the ability to deliver an appropriate and suitable development within its own red line whilst not prejudicing or impacting on future development options within the northern / western part of the wider site allocation. This should be reflected within the site allocation map and text.

• **Site Requirements:** the first bullet points notes that the "Suitable reprovision for all the existing uses will be required to be shown that they are no longer needed, or have been reprovided before any development can proceed. This will include: Crouch End Vampires / Greenfield Schools / Hospital function at Coppetts Wood Hospital."

Again, the above statement is confusing and ambiguous, suggesting that it would be necessary to demonstrate that <u>all</u> of the existing facilities are surplus to requirements before <u>any</u> development can take place. We stress again that the Coppetts Wood Hospital can deliver an appropriate and suitable development within its own site and reliance on adjoining land owners or the re-provision of other existing facilities could stifle development delivery.

We recommend that the policy text is clear that individual land owners will only be required to demonstrate <u>their</u> facilities are surplus to requirements e.g. Coppetts Wood Hospital will only need to address the loss of the existing hospital facilities, and would not be expected to address the school and changing facilities as well.

• **Site Requirements:** the second bullet point notes that "... this site could be converted to create a new school. If this is not needed for this purpose, it could be converted into residential use."

Again, the above statement is unclear and ambiguous. We assume that the statement refers to one of the existing school buildings on site but this must be clarified and explained further.

- **Site Requirements:** the third bullet point notes that heights should be limited to 5 storeys on the site and we confirm that we are generally supportive of this height and consider it to be largely suitable for the Coppetts Wood Hospital site in particular.
- **Development Guidelines:** the first bullet point notes the possibility of including the Church of Jesus of the Latter Day Saints within the site boundary. As noted above, we have serious concerns about the comprehensive development of the wider site, and do not consider this to be necessary to deliver an appropriate and suitable development on the Coppetts Wood Hospital site. We raise further concerns about the above statement given the Church is on the opposite side of the road and therefore disjointed from the main site by a busy road. We therefore see no merit or reason to expand the site further to include the church.

Appendix B: Housing Trajectory

We note that it has been estimated that site SA 56: Coppetts Wood Hospital could deliver c. 21 residential units.

We are surprised and confused by this low number of residential units given the wider site allocation covered within SA 56. We would welcome further feedback as to how this number has been achieved.

Our own masterplan appraisals for the Coppetts Wood Hospital site alone indicates that c. 85 units could be delivered.

We would therefore welcome further discussions with the Council in relation to the potential housing delivery on the site to ensure that the deliver of housing is optimised.

Overall

In light of the above, whilst we are supportive overall of the site allocation relating to Coppetts Wood Hospital we have raised some serious concerns about the current confusing and ambiguous drafting of the policy.

We strongly object to any suggestion that the comprehensive redevelopment of the wider site is required, together with an assessment of other existing uses relating to the school and changing facilities. We do not consider this necessary in order to deliver an appropriate development on the Coppetts Wood Hospital site, which would still respect future development options at adjoining sites.

The allocation for a 'mixed use development' should clarify that this is subject to demonstrating that the existing uses are surplus to requirements and once this test has been met residential development would be supported.

The current wording of the policy is also ambiguous in relation to the potential requirements for a new school or conversion of an existing building to residential. The exact location and building relating to this issue should be clarified.

Policy should also make it clear that any requirement to demonstrate existing facilities are surplus to requirement should only relate to those specific facilities relating to the landowner's site and there is not a requirement to address the loss of other facilities across the wider site.

We have also raised concerns about the projected housing trajectory for the site and are surprised that the potential delivery of housing has not been optimised.

We welcome further opportunities to comments on the wording of this site allocation as it evolves. 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

CaMs

For and on behalf of Catalyst Housing