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By email submission localplan@haringey.gov.uk

Dear Sir/ Madam,

**Local Plan Site Allocations Development Plan Document (DPD)
Main Modifications Consultation (January 2017) – Modified draft Policy SA42**

Savills has been instructed by NHS Property Services Ltd (NHSPS) to prepare and submit planning representations in response to proposed Modifications 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**). These comments follow earlier planning representations submitted to the Pre-Submission Version in March 2016 and the Preferred Options version of the Site Allocations DPD (SA DPD) in March 2015 (**Appendix 2**).

It should also be noted that our previous formal comments relating to the draft Strategic Policies and Development Management DPD (made March 2015) have not been addressed within the newly published draft versions of these documents or the proposed modifications. These representations still stand and we would urge the Council to reconsider them.

Draft Allocation SA42: Highgate Bowl

Main Modification SAMod80

The Council's summary table of the main modifications is incorrect in reporting under "reason for change" in relation to modification referenced SAMod80 - whereby it has been indicated that NHSPS have requested the open space boundary in relation to the SLOL designation be reflected as indicated in the Preferred Options DPD. To be absolutely clear, NHSPS sought to only identify the fringe development sites on the edge of the Bowl area to include the NHS site (as shown on the Preferred Options Proposals Map) but continue to strongly object to the principle of the SLOL designation and its identified boundaries, and more specifically in relation to promoting the exclusion of part of the NHS site known as the "walled garden" area within the south eastern part (as hatched on site plan 1 at **Appendix 1**). The details of these earlier representations which are now reinstated below are set out later within this letter and which continues to remain an outstanding objection.

Main Modification SAMod81

NHSPS supports the modification referenced SAMod81 which now strikes-through references to the Significant Local Open Space Land (SLOL) designation for the Highgate Bowl area. However, our earlier objection in relation to the wider open space designation to include the south eastern part of the NHS site remains.

There are continued concerns of the extent of the open space boundary and its overall purpose (in a similar vein to our earlier objections against the SLOL which is now removed).

There is no updated evidence to support the open space designation and its extent. Further, there is no functional justification or planning reason for improving public access to this area given the abundance of public open space within the wider area; the local area has not been identified as an area of local open space deficiency and the designation has been driven by a Neighbourhood Forum and their neighbourhood plan not by the Council itself on any planning and environmental merit. The Bowl does not have a public destination and it is hard to see what the benefits would be to improve public access to the local area given the Bowl's self contained nature with no destination identified within it or key routes through it.

Moreover, private landownership is affected by identifying land for public access with no justified reason to do so – and more specifically in relation to the walled garden area within the south eastern part of the site.

The “walled garden” area of the NHS site

Under the Pre Submission Plan and its Modifications (now subject to this current consultation), we welcome the continued identification of the NHS's site which currently accommodates existing horticultural buildings within a “fringe” redevelopment site outside the designated open space designation. However, as stated above, we continue to object to the private “walled garden” area being included within the wider open space boundary designation – both on a strategic and more site specific level.

The “walled garden” area 1) is private land with no current public access where there is no “public interest” case or technical evidence that can justify providing public access across it 2) will never act as a functional public open space area given its contained location within the NHS site and no connecting public access routes close by or in any proximity 3) any future public access created through the site at this part would significantly impact on Council (and Neighbourhood Forum) objectives to redevelop the site for housing purposes as an identified fringe site. Any redevelopment scheme is also likely to include this part of the site as a private amenity space area in any event and therefore, on this basis, it could remain open in nature. The inclusion of it within a wider open space designation is therefore not justified on fundamental grounds and found overly restrictive.

We therefore ask the Inspector to firstly challenge the validity and extent of the open space designation on the basis of the strategic points set out above and secondly propose to exclude the walled garden area from the wider open space designation, if the Inspector agrees with the Council on the validity of the designation itself, the exclusion of the site from the open space designation should be illustrated as found on our proposed modification to Map 1 shown on **Appendix 3**.

Modification SAMod82

ModificationSAMod82 is subject to objection on the basis that the Council has not provided any evidence to justify an “*enhanced access to through the arch of the Dukes Head Yard*” which will have significant impact on private landownership and access through it to include the NHS site adjoining the Duke's Head Yard site.

Public access through these sites will not only impact on private rights across private land but also create anti social behaviour and localised crime areas within a built up area where creating public access to the Bowl would have no functional purpose. It is recommended that this guideline is removed.

Modification SAMod83

In relation to modification referenced SAMod83, NHSPS continues to object on the basis that private landownership rights should be protected; and that it will be very difficult to apply any public rights of way across private land without any overriding "public interest" case or technical case on planning and environmental merit to support the open space designation at the Bowl. Similarly, modification referenced SAMod84 should also be excluded in deleting the sixth requirement under development guidelines which refers to public access to the open space designation.

Modification SAMod85

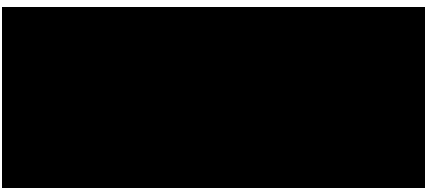
In relation to SAMod85, NHSPS continue to object to the principle of promoting a mews-type typology through redevelopment of the fringe sites. As indicated previously any redevelopment of these sites will be subject to a sensitively planned design which meets housing requirements at the time of the scheme promotion in terms of housing type and ensures viable and deliverable schemes come forward at these locations. It is therefore recommended that this guideline is removed.

Conclusion

We respectfully ask the Inspector to take account of the above comments and consider further modifications

We trust this submission provides sufficient information however should you require any further information or clarification, please do not hesitate to contact myself or my colleague Jonathan Pillow on 0207 075 2849 or by email at jpillow@savills.com.

Yours sincerely



Jane Barnett
Director
Planning