

10A SOUTH GROVE HIGHGATE LONDON N6 6BS

15 January 2017

Matthew Patterson Local Plan Team Haringey Council River Park House (6th Floor) 225 High Road Wood Green London N22 8HQ

by email only

Dear Matthew,

Please find set out below comments on SA 42 in the Site Allocations Document forming part of the Local Plan documents on which you are consulting prior to adoption by the Council. These comments are made by the Highgate Bowl Action Group which comprises:

- The Highgate Society
- Highgate Neighbourhood Forum
- Highgate Conservation Area Advisory Committee
- Friends of Highgate Bowl
- The Harington Scheme

Firstly, we set out below for the avoidance of misunderstanding, having looked at the recommendations made by the Examiner following the Examination in Public, what we believe is the currently proposed policy (the items in italics are the clauses where changes have been recommended. The numbering of the clauses is for ease of reference):

SA 42 HIGHGATE BOWL : EXAMINER'S AMENDMENTS

Examiner's comments amalgamated into Pre-Examination Version

Amend the site allocations map for Site Allocation SA42: Highgate Bowl to show the potential open space boundary within the site as set out in the Preferred Option consultation document.

Proposed Site Allocation

2.120 Protection of the Highgate Bowl as open space, and improvement of public access to it through limited redevelopment of Townsend and Duke's Head yards.

Commentary

- 2.121 The site falls within the Highgate Conservation Area. The site abuts the rear of several listed and locally listed buildings along Highgate High Street. The significance of the Bowl lies within its topography and the open character. The undeveloped nature of the Bowl, together with its appreciable gradient and extensive tree cover provides a soft setting for the Highgate High Street, allowing it to stand out as a distinctive feature in the townscape. This arrangement also separates the older village core, with burgage plot layouts, from the later suburban development to the north, thereby emphasising its evolution as a historic settlement. The community association of the site and the Bowl's role in the organic development of Highgate is the essence of its heritage significance that makes a positive contribution to the conservation area as a whole
- 2.122 This policy will establish the Highgate Bowl as a local open space, and the heart of the Highgate Bowl section of Highgate Conservation Area. Limited redevelopment within the area between the proposed open space, and the existing High St buildings will be permitted where it is possible to create complementary uses to the bowl, and improve access to and through the Bowl.

Site Requirements

- Development should show how the land included meets this policy and does not compromise co-ordinated development on the other land parcels within the Allocation. (1)
- The buildings facing the High Street, and their burgage plots should be retained. (2)
- Development offers the opportunity to secure the area identified by the green line on the site allocation and Policies Map as open space. Map of open space in the context of the allocation included as Figure 1 below.(3)
- Limited redevelopment of the garages and workshops in the two yard areas will be allowed to create mews-style residential development. This should not involve the loss of employment floorspace on the site.(4)
- Enhanced access to the Bowl will be supported through Townsend Yard and through the arch of Duke's Head Yard (5)
- Public routes through the various land parcels that make up the Bowl could be introduced to unify the open space, subject to the operational requirements of existing landowners and/or occupiers (6)
- The site lies within the Highgate Conservation Area and development should preserve or enhance its appearance as per the statutory requirements. (7)
- The existing educational/horticulture use on the eastern portion of the site will be retained. (8)

Development Guidelines

- Where new development takes place, heights should be subsidiary to those on the High Street. (1)
- Development should not impact on the residential and neighbourhood amenity of the adjacent blocks. (2)
- Due to the site's backland location, development should reflect a mews-typology (3)
- Some development may be possible within the 'yards' but these should be in a mews style development, perpendicular to the High Street. (4)

- The entrances to the yard roads should signal the open space hidden behind, with a visual link established where feasible. (5)
- The provision of public access to the area to be designated as open space would be supported. (6)
- Part of the site has a Local SINC designation, and this should be protected. (7)
- The open character of the Bowl is essential to the character of the conservation area and should be retained. (8)
- New development should be of the highest quality and enhance the character and appearance of the conservation area and the Bowl and outweigh any harm that may be caused by any demolition and redevelopment along with demonstrable public benefits. (9)

We understand that the intention of the Examiner and of this policy is that no development will be allowed within the green line shown on the plan.

For the avoidance of misunderstanding we attach the plan which we understand is to be included in the final version of the Site Allocations document. HBAG is happy with the position of the green line shown on this plan given the specific protection given to continuing educational/horticultural use of the Whole of the Harington Scheme site.

We also understand therefore that any development in the area defined as Highgate Bowl will be confined to the yards, namely, Townsend Yard, Broadbent Yard and Duke's Head Yard.

Other than Whistler's Cottage and a greenhouse associated with the garden centre no development has ever occurred on the area within the green line and, whilst not being 'public open space', it has always been open space and that it is and has always been recognised as having a special character.

With the above points in mind, we wish to submit the following comments on and changes for the policy for SA 42 for the Examiner's consideration:

- 1. 2.120 Proposed wording: Protection of the Highgate Bowl as open space, and improvement of public access through limited redevelopment of Townsend Yard, **Broadbent Close** and Duke's Head Yard (referred to below as 'the Yards')
- 2. 2.122 Proposed wording: This policy will establish the Highgate Bowl as a **designated** open space, and the heart of the Highgate Bowl section of Highgate Conservation Area. Limited redevelopment within **the Yards**, etc., etc.
- 3. Third Site Requirement: Development offers the opportunity to secure the area identified by the green line on the site allocation and Policies Map as open space. It is not clear precisely what land the reference to development offering an opportunity refers to. We assume that a distinction is being drawn within the SA42 allocation between the open space element within SA42, i.e. inside the green line and the rest of the SA42 allocation. It would be sensible to make this distinction entirely clear to guard against future challenge, but also future lack of clarity if wider development is proposed. We propose the wording should be changed to:

"Limited and sensitive development within the Yards offers the opportunity to secure the area identified by and lying within the green line on the site allocation and Policies Map as designated open space"

- 4. Again, Third Site Requirement: Development offers the opportunity to secure the area identified by the green line on the site allocation and Policies Map as open space: Ownership of the parcels of land does not necessarily straddle the Yards and the designated open space. There will be few situations where the opportunity to secure open space through development would apply. If the green line delineates an area which is sacrosanct, the meaning of this Site Requirement is unclear and therefore subject to challenge. Again, we would recommend the re-wording set out in 3. above.
- 5. Fourth Site Requirement: we are not sure why Broadbent Yard is not included. It does not, on the face of it, afford the opportunity to provide access but owners may wish to develop it. If applications did come forward we would wish to see that the criteria set out in SA 42 would apply to it. We recommend the fourth Site Requirement should be re-worded as follows:
 - "Limited redevelopment of the garages and workshops in **the Yards** will be allowed, etc., etc."
- 6. Fifth Site Requirement: for the reasons set out in 5. above we recommend the fifth Site Requirement should be re-worded as follows:

 "Enhanced access to the Bowl will be supported through the Yards, etc., etc."

We respectfully submit the above comments for your consideration.

Yours sincerely

Gail Waldman

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For and on behalf of the Highgate Bowl Action Group