

20 February 2015
Highgate NP

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Dear Sir/Madam

HARINGEY AND CAMDEN – DRAFT HIGHGATE NEIGHBOURHOOD PLAN – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD

Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Haringey Borough and Highgate and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document on behalf of Thames Water:

Policy OS4: Fringes of Highgate's Reservoirs

Thames Water recognise the aspirations of both the Forum and local residents that Highgate's Reservoirs are investigated for community access and are willing to work with the Forum in this respect. However, Thames Water's priority is to ensure the security of water supply. There is currently no public access to these sites for security and health and safety reasons.

When considering any proposals for public access, Thames Water would need to ensure that the structural integrity of the reservoirs and the operational function of the reservoirs are not compromised. As pointed out in the draft Neighbourhood Plan, whilst the reservoirs may appear as open space with grassed areas on top, large man made structures exist underneath which need to be periodically maintained to ensure their integrity.

Key Issue – Omission of Policy Covering Water Supply and Sewerage/Wastewater Infrastructure

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “**Local planning authorities**

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Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”

Paragraph 162 of the NPPF relates to infrastructure and states: **“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”**

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that **“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).**

Policy 5.14 of The London Plan, July 2011, relates to Water Quality and Wastewater Infrastructure and states: **“LDF preparation**

E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”

Policy 5.15 relates to Water Use and Supplies.

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network.

It is unclear at this stage what the net increase in demand on Thames Water’s infrastructure will be as a result of the Neighbourhood Plans proposals. It is therefore essential that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:

- The developments demand for water supply and network infrastructure both on and off site and can it be met;
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met

When carrying out the necessary early consultations with Thames Water regarding the capacity of water and wastewater infrastructure, in respect of development proposals, adequate time should be allowed so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of days. For example, the modelling of water and wastewater infrastructure will be important to many consultation responses and the time requires for responses must not be underestimated. For example, the modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows. Therefore, consultation should be undertaken as early as possible with Thames Water regarding the capacity of water and wastewater infrastructure to serve development proposals. Adequate time must be allowed for a high level risk assessment to be undertaken. Should more comprehensive responses be required, it is likely that more detailed modelling work will need to be undertaken. The necessary funding for

this work will need to be identified and secured through Developers and/or partnership working. It can take approximately 3 months to complete modelling work from the point funding has been secured.

Thames Water consider that text along the lines of the following should be added to the Neighbourhood Plan

“Water Supply & Sewerage Infrastructure

It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at:

<http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm>

Or contact can be made with Thames Water Developer Services by post at:

Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;

By telephone on: 0845 850 2777;

Or by email: developer.services@thameswater.co.uk”

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours faithfully



David Wilson BA (Hons), BTP, MRTPI
Associate Director Planning

Rachel Allison
Chair of Highgate Neighbourhood Forum
By email

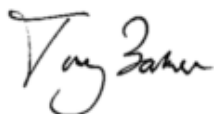
24 March 2015

Dear Rachel,

HIGHGATE NEIGHBOUR HOOD PLAN CONSULTATION DRAFT (JANUARY 2015)

I hope that you will be able to take into account the attached comments from the Harington Scheme. We did not comment before the deadline because we were content with the draft. We have just seen, however, the comments submitted on 20 March by Savills UK on behalf of NHS Property Services. You should know that they have chosen to ignore totally the points that we have made to NHS Property Services in recent discussions: that the "mixed development" proposals that they have discussed with Haringey planners at a pre-planning application meeting are totally unacceptable to us; and that in our view that the upper area of our site is too small to accommodate residential development, especially taking into account our own plans for expansion.

Yours sincerely,



Tony Baker
Chair of Harington Board of Trustees



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Joe Swift

Founded in 1980 by
Dame Geraldine Aves, DBE

HARINGTON SCHEME COMMENTS ON NHS PROPERTY SERVICES COMMENTS ON THE HIGHGATE NEIGHBOURHOOD PLAN CONSULTATION DRAFT (JANUARY 2015)

It seems to us that NHS Property Services have submitted these comments with the sole purpose of facilitating the “mixed developments” proposals that they have been discussing with Haringey planners and with ourselves. You may find it helpful in considering the NHS comments to know the background. The Harington Scheme operates under a one-year rolling agricultural lease. We have been negotiating for some years with the NHS, most recently with NHS Property Services Limited, to acquire the freehold at an affordable price related to the market rent that we currently pay. This would give us the demonstrable security of tenure that would enable us to raise funds and proceed with our plans to improve our facilities, increase our intake of learners and so provide greater public benefits.

NHS Property Services has a (narrow) remit to maximise the value that the NHS can realise from unwanted land. They, therefore, decided to employ Savills – no doubt at some considerable expense – to see whether they could establish that there was potential for residential development on the site which would enable them to sell it with a planning permission to a developer. We understand that in pre-application meetings Haringey planners made it clear that development proposals could only be considered in that part of the upper site where Harington has its main classrooms and offices, and not in the locally listed walled garden and the lower part of the site; and that they had to be acceptable to the Harington Scheme.

We met NHS Property Services on 27 March and told them that their development proposals were totally unacceptable for a number of reasons:

- The current mixed use of the upper part of the site “Plot C” is very well suited to working with young people with learning disabilities/difficulties. It comprises useful horticultural areas that are accessible for people with mobility issues interspersed with educational facilities (classrooms/offices). This creates an ‘open’ feel to the site which many learners find an attractive alternative to dense classroom accommodation as found in colleges. The layout and nature of the outdoor areas also allows several groups to work in relatively close proximity without feeling confined or distracted by others;
- We would lose the walled garden which would be for the exclusive use of the residents. The walled garden is an essential resource for Harington- used to train our horticultural students in how to maintain a formal garden (it provides the only possible area on the site for mowing practice); and for various Harington events (it is the only place where we can erect a marquee and hold our prize-giving);
- We would lose our glasshouse, also a valuable teaching resource, and a particularly valuable asset during wet weather when students cannot work on the plots on the lower site;
- Losing all of the existing courtyard would leave us with severely inadequate external space in the area of the classrooms for social interaction during breaks;
- Residents’ flats would be immediately above classrooms and the access to the flats and to our premise would be very close together. This could make it difficult to safeguard our vulnerable learners.

- The whole upper site would effectively be a building site for a long period. This would deter parents and learners from joining the Harington Scheme. We would then lose funding and have to lay off staff. We are now a significant local employer, employing 40 staff.

We thought that we had persuaded them not only that their current proposal would cause very significant detriment to Harington operations, but that the site was simply too small to accommodate residential development as well as our own expansion plans.

NHS Property Services promised at the 27 February meeting that they would let us have a letter before 11 March telling us what they now proposed to do. Instead they have chosen to ignore everything we said to them and to submit these comments, which are clearly focused on facilitating their development proposals. They have even had the temerity to suggest in paragraph 3.28 that their proposals “could support the improvement and enhancement of a community facility”. You can see from the comments above that they would not. They would cause severe harm to the Harington Scheme.

We probably do not need to tell you about the value of the Harington Scheme. In brief, we have been successfully providing education and training for young adults with learning difficulties for 35 years. We are an established part of the State educational system. We believe that the Neighbourhood Plan could best recognise the public benefit that we provide by making clear that the whole of our site should be reserved for the Harington Scheme and not available for commercial and residential development.

Finally, we do not understand why NHS Property Services have included “retail” in Plot A in their map of the site as this is not the current or future planned use of this area.

ATB



The Coal
Authority

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Ms Rachel Allison
Chair, Highgate Neighbourhood Forum

[BY EMAIL ONLY: info@forhighgate.org]

4 March 2015

Dear Ms Allison

Highgate Neighbourhood Plan – Pre-Submission

Thank you for the notification of the 3 February 2015 consulting The Coal Authority on the above

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the neighbourhood plan area is outside of the defined coalfield and therefore The Coal Authority has no specific comments to make on the Neighbourhood Plan.

In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide The Coal Authority with any future drafts or updates to the emerging Neighbourhood Plan. This letter can be used as evidence for the legal and procedural consultation requirements.

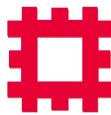
The Coal Authority wishes the plan team every success with the preparation of the Neighbourhood Plan.

Yours sincerely

R. A. Bust

Miss Rachael A. Bust B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MCMI, MRTPI

Chief Planner / Principal Manager



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2 March 2015

Dear Ms Allison

Consultation on the pre-submission Highgate Neighbourhood Plan

Thank you for your recent email to English Heritage inviting comments in respect of the pre-submission Highgate Neighbourhood Plan.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more proactive role in influencing how their neighbourhood is managed. The Regulations require English Heritage, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As English Heritage's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed neighbourhood plan for heritage assets. Accordingly, we have reviewed your document against the *National Planning Policy Framework* (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance so they can be enjoyed for their contribution to the quality of life of this and future generations.

Having reviewed the draft document we can offer the following observations and suggestions for consideration in respect of clarifying compliance with the NPPF and local policy and developing a robust neighbourhood plan.

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General comments

We are pleased to note that the Vision for Highgate recognised the high quality of Highgate's unique character and heritage as a key quality to be protected and enhanced. We do however feel that the draft Plan would benefit from refinement which would strengthen and clarify its overarching objectives and policies. In summary the main aspects of the plan which require further consideration are set out below (these are explained further in our detailed comments):

- As Highgate encompasses more than one local planning authority a major benefit should be to promote greater consistency and transparency in policies and decision making across borough boundaries.
- The Policies do not appear to always fully reflect the wider aims or concerns set out in the text. Consequently a number of the policies could be revised to better reflect or secure those objectives.
- The emphasis on the heritage of Highgate and its role in defining its strong character and attractiveness is not fully reflected in the Heritage and Development section. The policies focus principally on specific aspects of design where there is a perceived lack of efficacy. It would seem beneficial to set out how new policies relate to existing guidance and policy and provide a clearer identification of concerns in respect of heritage and the erosion of character; the broader aspirations for carbon-free and sustainable development, broader design guidance, and a framework for basement and backland development.
- As both Camden and/or Haringey already produce additional heritage, energy efficiency, basement and design guidance. The Plan is therefore an opportunity to clarify best practice in respect of Highgate's unique character as well as identifying the need for additional policy.
- We would suggest that as the proposed policies relate principally to new development or alteration the Plan should introduce greater distinction between the headings of new development, alterations to existing buildings, and energy efficiency. This would relate better to existing guidance.

English Heritage recommends that policies that build on the status of an area as a conservation area should be based on a thorough understanding of the area's historic and architectural character. The residents are well placed to judge this, as they have a deep knowledge of the area and its evolution. This is reflected in the proposed Plan but might benefit from more specific identification of character areas e.g. the wider suburban character and how this relates to the character and role of the economic centres.

We would also recommend a general consideration that the Forum review the existing evidence base (conservation area appraisals, local lists etc.) and consider whether these accurately identify the historic environment and its significance.

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Detailed comments on text.

Section 2: A summary of Highgate

English Heritage welcomes the inclusion of this section which provides the historic context to Highgate and promotes the rich and varied heritage of the area.

Pg. 15. A neighbourhood of varying needs. Para 2 states *This disparity is placing pressure on the social mix of the neighbourhood.* This sentence would benefit from clarification and qualification of the nature of this pressure. It is assumed that this relates to the need to provide a broader range of opportunities in terms of homes and community facilities.

Pg. 16. A place of special character. This section notes the issue with extensions and basements to existing properties. It may be helpful to refer to the supplementary planning guidance produced by the local authorities which acknowledges the sensitive nature of the geology of the Hampstead Highgate Ridge in this section (Camden's basement impact assessment SPD and ARUP's geological and hydrological survey). The concerns raised do not appear to have been developed in terms of specific policy suggestions or related non statutory guidance/action within the neighbourhood plan. It may therefore be appropriate to reference local authority design guidance or conservation area management guidelines, or to refer to relevant councils design reviews.

Highgate has a rich built heritage, and a number of archaeological finds and features have also been recorded in the area. The Plan area incorporates five Archaeological Priority Areas. As such the Plan would benefit from mentioning these in the summary of the heritage of the area, particularly as these have the potential to impact on proposed developments.

Section 3: A Vision for Highgate

Any issues relevant to this section are addressed in our general comments or under the relative Core Objective sections.

Core Objective 2: Economic Activity

P.32. The assessment of the historic character at the beginning of the sections for each key area (High Street, Archway Road and Aylmer Parade area) is a welcome addition as it serves to reiterate the importance of heritage to the Neighbourhood Plan and Highgate's special character.

P. 33 Para 3. We note the intention to address inconsistent approaches to the Village public realm is identified as being outside of the remit of the plan. In our view the Plan is an opportunity to address this, and as such would benefit from a clear policy specifically aimed at consistency across the public realm ensuring high quality workmanship, appropriate materials, and appropriately qualified professionals to oversee such work.

Core Objective 3: Traffic and transport

P.42. Policy TR3: Integrating parking provision. The requirements for off-street parking state that this must preserve the historic character of the area and preserve the setting of the buildings. This policy reflects guidance in the conservation area management plans with regards to front gardens and boundary treatments. It would be worthwhile considering best practice and referencing this policy to the management plans.

Core Objective 4: Open Spaces and Public Realm

P.48. Fringes of Highgate's open space. Highgate is particularly rich in varied open spaces which contribute greatly to its character and the high quality of life it offers. Highgate encompasses three historic landscapes of exceptional historic merit which are included on the Register of Historic Parks and Gardens. These are Highgate Cemetery (Grade I), Waterlow Park (Grade II*) and Kenwood (Grade II*). As designated heritage assets these not only provide valuable open space, habitats etc. but are highly significant as historic assets and should be managed in a way that preserves and enhances their special character.

P.49. Policy OS1: Fringes of Highgate's Open Space. A number of the policies are design policies which do not necessarily relate to open space and public realm and as such we believe that they would benefit from being re-located within the plan. It would also be useful to number the requirements for ease of reference in planning reports etc. To some extent the policies reflect Camden's existing design policies set out in *Planning Guidance document CPG 1*, particularly that set out in *Good Design 2.10*. In our view it would be worth considering how these policies relate to the particular character areas of Highgate and can be appropriately tailored to reflect the local context and can be consistently applied across borough boundaries.

The objective states *that new development shall not project beyond the built line past ground floor level*. The exact meaning of this is not clear and should be clarified i.e. does this mean *not project forward of the existing building line*, if so, how does this relate only to ground floor level.

Core Objective 5: Development and heritage

Pg. 60. In our view the "challenges" identified need greater explanation in terms of their impact and should be reflected in the following policies and guidance. Whilst there is a stated aim of ensuring that development is contextual and sustainable we would suggest that this section would benefit from greater emphasis on the need to preserve and enhance the special character, appearance and "significance" of the historic environment. Whilst the Plan does not need to repeat the NPPF or local plan policies heritage decisions are reached on the basis of the impact of proposals on heritage values and the significance of heritage assets. Where more specific guidance exists in the form of the conservation area appraisals and associated management plans it would be beneficial to sign post these and to consider how cross borough policies are applied. It is important to consider whether the existing evidence base is sufficiently robust, e.g. does it correctly identify the significance of certain aspects of the historic environment?

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Highgate contains many heritage assets recognised as of national significance through listing and broad heritage designations in the form of its conservation areas, the variety of buildings within the areas are diverse and often of high architectural quality. If there is a concern over the loss of specific forms of building then their contribution to significance needs to be clarified. This could be done in a similar manner to open space with a brief summary of character areas and the principal elements of significance. This could also inform new design in respect of materials, appearance, and the relationship of development to topography and urban grain. Reference is specifically made to demolition of original (historic?) buildings. If the intention within the Plan is to protect those buildings which make a positive contribution to the character and appearance of the conservation areas, are they appropriately identified? We would recommend that you consider the guidance on Neighbourhood Plan Policies on our website to help with this at www.english-heritage.org.uk (neighbourhood-planning-information).

P.6.1 Policy DH1: Demolition in Highgate's conservation areas. We are concerned that the phrase "make a significant contribution to the setting and character" potentially fails to achieve the stated aim and offers a position less strong than that set out in the NPPF. The NPPF requires heritage assets to make a positive (rather than significant) contribution to significance and as such applies the tests set out in paragraphs 132 or 133 in respect of the extent of harm. We would suggest consideration of amending the proposed policy to "buildings and structures which make a positive contribution to the character and appearance of the conservation area and its setting" to better reflect the wording in the 1990 Town and Country Planning Act and NPPF. The exceptional circumstances referred to could then be related to the public benefits which may contribute to a justification for harm as set out in the NPPF.

The Policy does not address where works which do not comprise demolition but cause harm are proposed or the standards expected in respect of replacement buildings which detract from the local character. It may therefore be useful to consider the aspirations for domestic and retail design guidance and to clarify terms such as "overdevelopment".

The policy mentions the demolition of unlisted buildings, but does not reference locally listed buildings, which whilst not statutorily protected are afforded a higher level of protection by the Borough's than a building not on the local list. Local Lists are maintained by both Haringey and Camden Councils. We would also suggest exploring the possibility of updating local authority local lists to identify those buildings of historic character outside of the existing conservation areas.

Pg.65. Policy DH3: The environmental health of future residents. The wording of this policy requires further thought. We assume that the intention is to ensure that new development seeks to mitigate the environmental impact of the busy road corridors. It may be unreasonable to expect collation of such reports for simple internal subdivision as such works may not require planning permission. This may be therefore be better approached through broader guidance on high quality sustainable design and broader measures to mitigate traffic impacts such as planting.

Pg.67-8. Policy DH5: Basements. This policy needs to take into consideration the context of the building within which a basement is being proposed and we would

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value the inclusion of a statement to that effect. English Heritage is of the view that basements within listed buildings should not have a harmful impact on the significance of the building, and where this is the case the proposals will need to be assessed against the criteria for harm set out in NPPF policies 132 to 134 and on a case by case basis.

Pg.71. Policy DH7: Backland development. This policy should include a statement on the preservation of the historic character of the area and how green spaces can contribute to this. This is mentioned in the text before the policies but would benefit from further inclusion in the policy itself.

Related non-statutory 'Development and Heritage' actions

CA 35: Encourage local initiatives to spread the message about environmental changes that can "green" our lives. English Heritage produces extensive guidance on micro-renewable energy, buildings regulations and the historic environment accessible through the Climate Change and your Home website (www.climatechangeandyourhome.org.uk). Camden Council also produces guidance for energy efficiency in conservation areas and area specific guidance for Dartmouth Park which would prove a useful reference point.

CA36: Discourage external shop shutters. The issue associated with this action is not addressed in the text. The perceived problems with external shutters should be addressed and a link to shopfront design guidelines could be made. Camden Council currently have a detailed shopfront design guide available at <http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/before-you-apply/residential-and-business-projects/shop-front-alterations/> and Haringey has area specific design guidance. There are numerous forms of shutters available, both internal and external, as such it may be worth considering in what circumstances and locations would shutters be acceptable and whether there is an acceptable form.

Pg. 72. Key Area Policies. In our view these might be more accurately identified as key sites. We do not wish to comment in detail on the included sites, and we would do so in response to any consultation on the local authorities' site allocation documents. However, this section could usefully highlight the advantages of consulting neighbourhood groups as part of the pre-application process for development so that concerns and aspirations can be raised prior to any formal application

Our comments are intended to encourage a more beneficial Plan and we would hope that you find the comments and observations useful. We would of course be happy to provide further advice in respect of any of the above, or other, issues, if this is helpful.

Finally, it must be noted that this advice is based on the information provided by you and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently relate to this or later versions of the Guidance, Appraisals and Management Plans, and which may have adverse effects on the environment.

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Yours sincerely



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19 March 2015



Rachel Allison
Chair
Highgate Neighbourhood Forum

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Dear Ms Allison

Representations to Highgate Neighbourhood Plan Draft for Consultation (January 2015)

We write on behalf of our client, Archway Apartments Ltd, to provide representations on the Highgate Neighbourhood Forum's draft Highgate Neighbourhood Plan document.

Our client's interest is focused on 191-201 Archway Road, which is located on the western side of the A1 Archway Road, at the junction with Causton Road. They are the new owner of the site.

The site and interior of all buildings is in a very poor state of repair and had been under the ownership of the same family for a number of years prior to its recent sale. Archway Apartments Ltd are in the initial stages of developing draft development proposals for this important site.

Aside from participating in this formal public consultation, the site owner and their advisors will welcome the opportunity to present our ideas to the Highgate Neighbourhood Forum in the near future.

This letter serves to provide a brief overview of our client's initial development proposals, sets out our client's comments on the draft Neighbourhood Plan, and makes suggestions for future drafts of the Plan. We look forward to engaging with the Highgate Neighbourhood Forum as both the Highgate Neighbourhood Plan and our client's development proposals for the 191-201 Archway Road site progress.

Development Proposals

The development proposals for the site are at an early stage. We have yet to engage in consultation with key local stakeholders but can confirm our commitment to do so.

The initial proposals include the retention of the existing building facade fronting Archway Road, the reinstatement of A1 retail use on the ground floor of the site, and the replacement of the existing low quality bedsit type HMO accommodation with high quality residential flats. There may also be the potential to include a variety of other complementary uses on the site.

It is expected that the redevelopment of the site could deliver a number of key planning benefits for the site and wider surrounding area, including:

- *Development based upon the retention of the key street facades, and the maintenance of a viable Class A1 retail unit along the street frontage to Archway Road.*
- *Opportunity to convert under-used, run-down buildings into a new high quality mixed use development.*
- *Sensitively designed enhancements to the existing building on Archway Road which will respect and preserve the Highgate Conservation Area.*

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- *Provision of a scheme of appropriate scale and density.*
- *Provision of a good mix of homes on the site that provide a high quality of amenity for residents in an efficient and sustainable building.*
- *The site owner is mindful of the Council's affordable housing policies and how these apply to future residential development at this site.*

We provide these representations to set out our comments to the Highgate Neighbourhood Plan in the context of our client's emerging development proposals.

Highgate Neighbourhood Plan Policies

We are supportive of the key aims which seek to encourage Highgate to grow and prosper as a united community. We comment on specific policies as follows, and would like to reserve the right to comment on other draft policies contained in further iterations of the plan.

Policy SC1: Highgate's Housing Needs

Draft Policy SC1 states that *"new residential development will be required to demonstrate how they are contributing towards a range of housing types and formats to meet the identified needs of the Plan area."*

We support the delivery of an appropriate mix of dwelling types and sizes but consider that it should be made clearer within the policy that this should be informed by individual site characteristics and constraints. Scheme viability is also a key determining factor in formulating housing mix, and consideration of this should be referenced in the next draft of the policy.

Policy SC2: Community Facilities

We acknowledge the requirement for additional community infrastructure as part of new development proposals. We do, however, consider it important for policy to be worded in such a way that it incorporates sufficient flexibility to reflect the viability of individual schemes.

Policies should not seek to unduly burden schemes beyond which they can viably afford. This could otherwise frustrate the delivery of much needed new development, and the other social and environmental benefits associated to new development

Proposed Highgate Neighbourhood Plan Core Objective 2: Economic Activity

We support Core Objective 2, which seeks to *"attract, maintain and enhance employment, particularly where it can enrich and enliven the public realm."*

The objectives of draft Core Objective 2 do, however, need to be consistent with those in paragraph 22 of the NPPF, which seeks to avoid the long term protection of sites for employment use where there is no reasonable prospect of a site being used for that purpose.

Paragraph 5.1.4 of the Local Plan also states that the Council will take a more flexible approach where local employment areas are no longer suitable for industrial or other employment generating uses, and a progressive release of surplus industrial land will be carried out, in order to facilitate urban regeneration.

Draft sub-objective 2.1 seeks *"the implementation of a new vision for the High Street, Aylmer Parade and the business premises in the Archway Road that is forward-looking, entrepreneurial, sustainable and attractive."* We support this vision but believe this can be achieved through providing a mix of non-residential uses, rather than solely B Class 'typical' employment-generating uses.

Retail, leisure and community uses can also provide active and attractive street frontages and significant employment benefits. Such uses should be encouraged as part of the promotion of economic activity sought by draft Core Objective 2.

The next draft of the Highgate Neighbourhood Plan should state that while employment uses can be important to a mix of land uses, outdated and low quality floorspace should not be forced to be retained where comprehensive redevelopment of a site to include a variety of non-residential uses could provide a better mix.

Where appropriate, these opportunities for comprehensive redevelopment, should be supported, and focused on the uplift in number of jobs, and increasing the quality of floorspace, rather than on replacing or increasing the quantum of B Class employment floorspace.

The draft Core Objective 2 seeks to be “*forward looking*”. We suggest that there should be written clarification of this in the next draft of the Plan, and that sub-objective 2.1 should state more clearly that employment opportunities should not be limited to only B Class uses, and traditional employment generating uses, but should support all uses which create employment opportunities, including land uses such as D1, D2, A1 and A3.

Proposed Highgate Neighbourhood Plan Policy EA2: Archway Road

We note that draft Policy EA2 seeks to introduce a presumption in favour of retention of Class A1 and A3 uses along Archway Road.

As set out in response to draft Core Objective 2, we consider that draft policies coming forward should support other complementary land uses in the area where they can also provide attractive and active street frontages. The policy should not preclude the inclusion of other land uses (such as those within Use Class D1 and D2) within street frontages on Archway Road. Any such policies would be in conflict with the Council’s Local Plan and therefore resisted.

Core Objective 5: Development and Heritage

Draft Core Objective 5 aims to “*conserve and enhance the essential and unique character of Highgate*”. We support the principle of Core Objective 5. This needs to be consistent with section 12 of the NPPF where bullet point 1 of paragraph 126 states that local planning authorities should take into account “*the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*”.

We believe that new, modern and complementary materials should not be unduly restricted where they do not cause material or demonstrable harm or undermine the character of the area. Reference to paragraphs 126-141 of the NPPF is essential as these are the fundamental tests relating to heritage assets.

Policy DH1: Demolition in Highgate’s Conservation Areas

Draft Policy DH1 states that proposals to demolish unlisted buildings that make a significant contribution to the setting and character of any of Highgate’s conservation areas will only be supported if exceptional circumstances can be demonstrated that outweigh the case for retention. The supporting text to this policy states that insensitive development has on occasion undermined the coherence of the conservation areas, their buildings and their settings. One cause of this has been the total demolition of buildings and replacement with unsuitable modern or pastiche designs.

We propose the insertion of clarification on this matter which states that where demolition or partial demolition can significantly improve the appearance of the site or allow the development potential of the site to be optimised, this should be considered favourably.

Policy TR2: Parking Levels in Highgate

Draft Policy TR2 states that “*new development must provide the minimum necessary car parking provision. Where practical, development will be expected to be car free in areas that are easily accessible by public transport and/or within any area designated as a Controlled Parking Zone.*”

We suggest that parking provision should be reviewed carefully in light of site specific constraints. Where provision can be supported by evidence which demonstrates no adverse impacts on the surrounding network, this should be

considered favourably; the absence of harm is a fundamental planning principle and should be reflected within the Plan.

Summary and Future Participation

We are supportive of the Forum's aspirations as set out in the draft Neighbourhood Plan. Our proposed recommendations and amendments seek to maintain flexibility for sites to come forward in a positive way which best respond to individual site constraints and characteristics.

Our representations have been prepared in the context of initial emerging development proposals for the 191-201 Archway Road site. We request the right to comment on further draft policies as appropriate.

Our representations to the draft Highgate Neighbourhood Plan have been sent to the Highgate Neighbourhood Forum, and the London Borough of Haringey Council.

We would welcome the opportunity to present our initial proposals to the Highgate Neighbourhood Forum at the earliest opportunity. We hope to continue to engage with the Highgate Neighbourhood Forum as the Highgate Neighbourhood Plan progresses.

We look forward to receiving confirmation that our client's representations have been received, and will be given due consideration during the preparation of the Highgate Neighbourhood Plan. Please feel free to contact David Whittington (dwhittington@savills.com) or Diana Thomson (dthomson@savills.com) if you have any queries or would like to discuss.

Yours sincerely

David Whittington
Director

cc. Aaron Lau, London Borough of Haringey