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4th March 2016

Dear Sir,

**HAWES AND CURTIS, 590 GREEN LANES, HARINGEY, N8 0RA
REPRESENTATIONS TO SITE ALLOCATIONS DOCUMENT POLICY
DOCUMENT, 'PROPOSED SUBMISSION VERSION,' POLICY SA26**

I write on behalf of my client, Hadley Property Group, to submit representations to the Site Allocations document which is currently at 'Proposed Submission,' to express concern over the introduction of additional wording regarding the need for an NHS facility under emerging policy SA26. Hadley Property Group are the freehold owners of the former Hawes and Curtis site and intend to redevelop the site to provide a high quality residential led mixed use scheme, however the newly inserted requirement for a 1,500m² NHS facility is leading to an unviable Site Allocation.

Site Context

The site currently comprises a two storey retail warehouse occupied by Hawes and Curtis as their outlet store. The shape of the building itself is largely rectangular and is set back from Green Lanes to allow for a number of car parking spaces.

The site is bounded by Colina Road to the south, Colina Mews to the east and the Langham Club to the north. The site benefits from an 'Excellent' PTAL rating of 6a towards the front of the site, with a 'Good' rating of 4 towards the rear. This is set to improve over the next 10 years with the proposed Crossrail 2 station at Turnpike Lane which is less than 100m from the site. The site is within walking distance from Haringey overground station, Haringey Green Lanes and Turnpike Lane to the north.

The site is not locally listed, nor is it within a Conservation Area. In essence, the site presents an excellent opportunity for redevelopment to provide a residential led mixed use scheme given the site's highly sustainable location.

To date we have attended three pre application meetings with the Council, presented the scheme at the Quality Review Panel and the Sub Committee.

Current Proposed Site Allocation

Proposed Submission Site Allocations Development Plan Document, Policy SA26 states that the site is allocated for a 'mixed use redevelopment to create residential-led mixed use with a new medical facility.'

Further commentary states 'the current use of the site for retail warehousing can be replaced with more intensive use to match the high levels of public transport access on Green Lanes. Following consultation with NHS property services, there is an emerging need for a new GP practice in this area, and the edge-of town centre location means this is a suitable location for a mixed use development comprising of a new health centre and residential.'

Representations

NHS Requirement

Hadley has a number of comments to make on the requirement of the NHS facility.

NHS use has not previously been included within the emerging Site Allocations DPD and has therefore not been consulted on

The requirement for an NHS facility was a late addition to the emerging Site Allocations document. Previous versions, including the Regulation 19 'Preferred Options' document consulted on between February 2015 and March 2015 did not reference the need for a medical facility. The proposed allocation to include the NHS facility has therefore not until now been consulted on.

Furthermore the NHS have not previously submitted representations to LB Haringey on their requirements for a new facility in this location.

NHS requirement in this location not supported by evidence base

The inclusion of the requirement for a new NHS facility is not wholly and robustly supported within the evidence base. The Draft Health Infrastructure Plan 2011-2026 dated October 2011 states that there is a national target of 1GP per 1,700 of population (as established by the NHS Healthy Urban Development Unit). There are currently 191 GPs in Haringey in 54 premises. With a current population of 228,837, Haringey would be expected to have 135 GPs. Therefore, based on the current population figures the Borough as a whole exceeds its requirement for GPs.

The document does note however that there is a geographical mismatch with a GP deficit in the south eastern area where there are pressing health issues, as well as in the east /north east Tottenham area. Therefore, given the current constraints on public spending, NHS Haringey's planning

assumption is for an increase of 12 GPs by 2026, of which 8 GPs are associated with the east of the borough.

The site at Green Lanes is situated centrally within the borough and is therefore not considered to be best located to provide an additional GP surgery to mitigate this disparity, given patients should be within walking distance of their local surgery. A new facility would be best located within the centre of the eastern part of the borough. This will ensure the catchment area captures the residents who currently suffer from the deficit of GPs in their area.

Quantity of NHS Floorspace

Hadley has endeavoured to liaise with the NHS on a number of occasions to discuss their needs and operational requirements for a new facility in line with the emerging site allocation.

Previous requests from the NHS have ranged in floorspace requirements from between 700m² and 1500m². The uncertainty on the exact NHS floorspace and operational requirements as well as position on financial contributions is leading to the stalling of the scheme and inability for a scheme to be progressed and come forward on this site.

The current proposed allocation includes a 1500m² floorspace requirement. There is however, no justification for this within the emerging site allocation nor has this been set out as a requirement within the evidence base. In addition, the NHS have not submitted representations to Haringey Council specifically requesting a new facility in this location, nor have they set out their required floorspace for a new facility.

Viability

Any Local Plan designation or scheme brought forward by Hadley Property Group needs to be viable, taking into account the cost associated in providing an NHS facility. Policy SA26 must therefore comply with the NPPF paragraph 173 which reads:

"Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."

Ensuring the Site Allocation is viable is therefore fundamental to ensuring the delivery of a deliverable scheme on this site. As it stands the requirement to deliver an NHS facility at 1500m² and lease at zero rent to

the NHS renders the site allocation unviable, and therefore conflicts with Paragraph 173 of the NPPF.

Therefore, the policy wording needs to be amended to promote greater flexibility on the floorspace requirement for the NHS. It is suggested that a range may be suitable, for example from 700m² to 1,000m² which will be dependent on the viability of the scheme as a whole. In addition greater flexibility regarding the height and residential density the site can deliver needs to be reflected to allow for a viable Site Allocation.

Density

The site has the capacity to accommodate a significantly denser scheme than stated within the emerging Site Allocations document. Providing just 73 units in this highly sustainable location with a PTAL rating of 6+ is a conservative approach taken by the Council, given the strategic significance of the site. Furthermore, the site is approximately a 10 minute walk from the proposed new Crossrail 2 station at Turnpike Lane which would further improve the access, which must be taken into account when setting proposed site capacities.

Not only is the site sustainably located in terms of public transport, but any new development has the potential to create a sense of place and a local community feature when entering Green Lanes. This opportunity must be maximised and encouraged within the wording of the emerging Site Allocations policy.

Consideration of pre-application scheme

Paragraph 4.3 of Appendix 4 of the emerging Site Allocations document states 'where details of pre-application proposals are available and considered reasonable, the relevant housing capacity and employment floorspace have also been used to inform the site allocation.'

Since the publishing of this draft Site Allocations DPD, Hadley have held 2 pre-application meetings with LB Haringey for a residential led mixed use scheme.

The formal pre-application written feedback from LB Haringey supports the principle of the scheme and density stating, '*the latest scheme presented to officers considered ambitious development proposals but not in principle unacceptable in urban design and land use terms, provided the designs are of sufficient quality and resolve detailed challenges. Over the two pre-application meetings, the proposals have developed to a significant degree...the principle of developing the site for medical centre and residential purposes is considered to be acceptable in principle subject to the applicant providing floorspace in line with NHS requirements.*'

I trust the above representations will be taken into consideration when assessing the content of the Proposed Submission version of the emerging Site Allocations Document. If, in the interim, you have any queries please

do not hesitate to contact either Sophie Hinton or me at this office. I look forward to your formal acknowledgement of our representations.

Yours faithfully,



John Ferguson
Senior Associate Director