

JOINT
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10 65, 68, 69, 70, 71, 72, 73, 74, 75, 76
77, 78

Dear Ciara,

Local Development Framework

You sent me a consultation letter in my capacity as **Secretary of Friends of the Parkland Walk**. I also asked to be consulted in my role as Chairman of the **Joint Conservation Areas Advisory Committee**, but I did not get a letter in this capacity. I have since become Vice Chairman of the Hornsey Conservation Areas advisory Committee. I am also on the Haringey Design Panel who also do not seem to have been asked to comment or be involved. I thus can comment in four roles on the three documents you have out to consultation at the moment.

I have registered on the web site but the site seemed to fail at the first submission – I could not see what had uploaded, so I have abandoned that hideously unfriendly portal and resort to a more traditional letter, which I understand you will consider in the same way.

I will append my detailed comments to this letter in a structured way according to the body I am representing. Generally I am commenting on:

- Core Strategy in general (but Town Centres, Design and Conservation in particular) in my **JCAAC** role and this has been syndicated through the Haringey Federation of Residents Associations.
- Core Strategy – Open space in my role as Secretary of the Friends of the Parkland Walk
- DMP as JCAAC chair
- Sites as HCAAC chair in respect of sites in N8 and other sites as a Design Panel Member.

Generally I note that the Core Strategy has been through earlier stages in accordance with your Statement of Community Involvement (SCI), although I missed these stages through lack of engagement. It would appear that the Sites and Development Management Policies have emerged at this time with no previous options stage or community engagement, despite the process and expectation set out in your SCI.

As I am on the bodies noted above, I would have expected to have been invited to early soundings on potential policies, shortcomings of the existing system in the UDP or site brainstorming. As I have not, I must therefore question the soundness of the process because of the apparent lack of compliance with your own SCI.

I feel I must also restate the comments I made at the workshop on June 2nd when I commented that your consultation resource is being overloaded at one time by three important documents.

As it is not essential to issue the DMP document or Sites at this time, they can follow the Core Strategy as the UDP policies are saved for three years (extendable) then it appears to be a Tactic of

Community Exclusion to overload your potential respondents in this way. This is surely contrary to the spirit of community involvement as intended by the Act and PPS12, and I agree with Colin Marr's remark that the documents should be withdrawn and re-worked to follow your own Statement. They appear to be rushed, muddled and unchecked. As the research stage and workshops appear to have been skipped, the Council should use the material as a discussion paper for such activities and then refined into a first draft for community engagement.

PPS12 sets out what a Core Strategy should do. I consider that it has strayed into the territory that should be in the Development Management Policies. Even that title is questionable as it is too closely related to Development Control (rebranded as Management) when the intention of the new LDF system is to take in management of the spatial arrangements by all public bodies using a range of legislation. It appears to be merely a roll-forward of the old UDP with a few add-ons. It is very light on implementation methods and mechanisms and given recent changes introduced by the coalition Government the areas of housing targets and transport projects are in a state of flux and the assumptions are now questionable, as is the whole concept of growth in economic and sustainability terms. I am deeply worried about the relationship between proposals for Tottenham Hale, particularly following the uninspiring feedback from the public consultation there, and the needs of the Tottenham High Road Historic Corridor. The two are indivisibly linked and one has already damaged the other.

I fear that the Core Strategy has attempted too much and should be slimmer and more focussed on desired outcomes and should give some certainty. I regret that as phrased at present it raises more questions than it answers and although it has site allocations there is not the required Proposals Map.

I conclude that some poor management decision have been made by your senior managers to cut corners and rush the matter through. In the final analysis, this makes the whole process unsound as circumstances are now different from the time background work was done. Your fact-finding has not been thorough enough and key people and organisations have not been engaged in the way the SCI states and workshops would have considerably improved the newer of the three documents we have before us at present.

Yours sincerely


C J Mason

Core Strategy objections / support from Chris Mason as Chair of the Joint Conservation Areas Advisory Committee

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Policy SP10 Town Centres – Paragraph commencing “The Council will promote....”
Consider as unsound (not justified)

The inspector is invited to satisfy himself that the retail study on which growth is justified is still valid and sustainable in present circumstances and whether adding extra floorspace is sound. A different approach may be needed to quality, mix and facilities to amend dying shopping areas in traditional arrangements by more subtle renovation and, where heritage assets abound, to use heritage led regeneration as promoted by PPS5.

31/1/5.3

~~X~~

Policy SP10 Town Centres – Paragraph commencing “Wood Green Metropolitan Centre.”
Consider as unsound (not effective and not consistent with National policy)

The word vibrant turns up in many places in this document and is another cliché. To some a centre full of life is vibrant, to others vibrant means noise and disturbance.

As with the trite phrase High quality, this needs to be questioned wherever it appears and better words used to say what is wanted.

It is understandable what is wanted, a place that is smart, meets the aspirations of shoppers, is a good place to visit with the right mix of facilities at the quality expected and at the hours when service is demanded. it needs to have a sense of place and going there should be an occasion, but one should feel safe going there at any time.

31/2/5.3

~~X~~

Vibrant can mean edgy, exciting, noisy, brash, loud - surely those are not the qualities to be pursued.

Change considered necessary: Question every use of the words high quality and vibrant. They could be shorthand for letting in something that is uncertain or not wanted respectively.

Policy SP10 Town Centres – Final paragraph
Consider as unsound (not effective)

See observation in Conservation Section on Tottenham High Road Historic corridor. This Strategy should give certainty and thus is too vague a remark for a Core Strategy. The degree of change and the nature of activities in the opportunity area should be set out as a vision.

31/3/5.3

The existing cheaply erected retail sheds are draining the lifeblood out of traditional centres such as Tottenham High Road Historic corridor and these need subtle surgery to change small units from fringe activities to being once more the heart of communities.

Change considered necessary: The inspector is invited to consider whether it may be better to give greater emphasis to commerce and local shopping for extensive new residential activities above other mixed uses, and shift the emphasis for major shopping expeditions away from Tottenham Hale and back to Tottenham High Road Historic corridor and other District centres. There are plenty of examples of historic cities where the facilities found in purpose built shopping centres can be grafted into a heritage location to make them work once more in present circumstances. Redevelopment at Tottenham Hale needs to generate the value to make the change worthwhile, but it is questionable if this should be shopping led.

Page: 138

SCS Priorities panel

Consider as unsound (not consistent with National policy)

31/4/5.1

There are two additional issues to bring to bear here. One, in historic areas, is to bring heritage led regeneration to the Borough and by applying this principle from PPS5 it will also assist sustainability aims by re-using and secondly, adapting buildings to save the embedded energy in the existing building stock.

Change considered necessary: add these as additional priorities

Policy SP11 – Design – second word.

Consider as unsound (not consistent with National policy)

The word 'new' is redundant. As defined by the 1990 Act development includes all work that materially changes the face of the Borough. Including this word could lead to developers arguing that poor alterations are acceptable because only new should enhance. Alterations can spoil a place as much as poor new work, therefore all development should enhance its location and create new places that promote a better quality of life.

31/5/61
68

Change considered necessary:

Policy SP11 – Design – second line.

Consider as unsound (not effective)

High Quality is a phrase so easy to trot out but is meaningless unless qualified in some way. It occurs in the first bullet point and further down in respect of landscaping an access. The standard will be what the developer can get away with and that the planning authority will not refuse if it fears an appeal or inquiry.

Change considered necessary: These points therefore need to be re-written to give a measurable standard against which there is no argument.

Page: 139

Policy SP11 – Design –fourth bullet point

Consider as unsound (not effective)

How high is high? Similar comment to Policy SP11 – Design – second line. This may not be the highest standard in the world but may be good enough for its location. A housing association scheme will not be at the same standard as an expensive development of executive flats. At the lower end the potential residents must not be saddled with inappropriate or just bad landscaping, access design or materials.

Change considered necessary: rewrite as noted in earlier observation.

Policy SP11 – Design –second section first bullet point

Consider as unsound (not effective)

Meaningless phrase as noted above. The supporting text is more explicit and this should be reflected in the policy.

Change considered necessary: Suggested re-wording: Buildings substantially taller than their surroundings will only be permitted in Haringey Heartlands, Wood Green and at Tottenham Hale in the Area of Opportunity / Intensification, where the expected limit is 10 storeys.

31/6/61
69

Paragraph 6.1.4 First line.:

Consider as unsound (not effective)

Another example of the use of a meaningless phrase. The only power a planning authority has is to refuse something bad or antisocial. LBH need to state what it will / should do.

Change considered necessary: Suggest: The Council will refuse permission for development proposals that are of inadequate quality in terms of materials, disposition on the site or materials with short life that will require constant maintenance.

Paragraph 6.1.5
Consider as unsound (not effective)

Not just development schemes. Small and incremental change can damage townscapes and degrade conservation areas. Poor shopfront alterations in particular can damage historic centres.

Change considered necessary: This needs to change to "All development, whether alterations or more extensive replacement of built fabric"

Paragraph 6.1.6
Consider as unsound (not justified)

Cases that go to the full committee etc. This is not the case. If one reads the constitution to see which cases go to full committee, it will include cases referred by members or community groups objecting. These will not be cases seen by the Design Panel.

Change considered necessary: This should be altered to read "Significant proposals that may be controversial, and thus go to the full planning committee, will first have been scrutinised by the Design Panel, preferably at the pre-application stage.

Paragraph 6.1.6
Consider as unsound (not justified)

Automatically presented. This is not the case either. Very often the Design Panel has been used to kill off bad proposals before they become applications, or indicate ways the developer might improve a poor design or one with problems. It is, in effect a local body with a similar remit to CABE, encouraging better design but often having to be a critical friend.

Change considered necessary: This paragraph should be re-worded to reflect that situation.

Page: 140
Paragraph 6.1.11
Consider as unsound (not consistent with National policy)

As a result of the publication of PPS5 on the day this document was cleared for consultation,

Change considered necessary: this now needs to read "Design, Heritage and Access statements".

Paragraph 6.1.12
Consider as unsound (not effective)

Another example of bland and meaningless wording - what is good quality access, how different from bad quality access?
This needs tighter wording.

Change considered necessary: Suggest:
The council will require all new developments to have access for people with impairments by the same route as able bodied people and take into account the needs of people with sensory problems. When buildings and spaces are adapted, existing barriers to movement will be removed where it is safe and practical to do so. Where this is not possible the best compromise between the competing needs of people with different impairments will be required.

Paragraph 6.1.13 - first words

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31/8/6-1

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31/9/6-1

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31/10/6-1

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Consider as unsound (not effective)

That meaningless phrase again. Much of the material being put into Haringey's town centres is of standard or poor design and put there by Haringey's engineers. This trite phrase is not good enough and smacks of tokenism.

Change considered necessary: this needs to be amended to reflect the differing circumstances found in different locations – "Paving and other details need to be appropriate to the period and style of the town centre, if historic, or create a new sense of place and take the wear and abuse in a hard working modern environment."

Paragraph 6.1.13 – Last phrase
Consider as unsound (not effective)

The boundary wall issue needs to tie up with parking policy and crossover facilitation and, in places, Article 4 directions. Enclosure of streets in sensitive conservation areas can be wrecked by the creation of crossovers and front garden parking. There is no net gain in parking as the crossover prevents any driver using that kerb space. There is a reluctance to make A4 directions, but integrated thinking is necessary across departments.

Change considered necessary: this sentence needs to reflect the outcome of the cross departmental co-ordination required by PPS5 and the guidance notes issued with it.

Page: 141
Paragraph 6.1.14
Consider as unsound (not effective)

This could be stronger, more demanding and less of a sales pitch.

Change considered necessary: suggest change to: The Council will require green roofs or brown roofs on new developments where practical to do so to provide wildlife habitats, improve insulation and attenuate rainwater run-off.

Page: 142
Policy SP 12 – Conservation – second word.
Consider as unsound (not consistent with National policy)

Repeat of remark in respect of development in SP 11. This is even more important in respect of this policy as relatively small changes to windows and their detailing, depth and modeling of the frames can have a devastating effect on character.

PPS5 clarifies what is meant by Heritage assets and this can include unlisted assets and those on the local list of buildings of Architectural or historic interest.

Thus this policy must include development in all its forms - redevelopment and alterations.

Change considered necessary: delete the word new.

Policy SP 12 – Conservation – introduction to bullet point list
Consider as unsound (not effective)

This sentence might be better if reconstructed

Change considered necessary: The council will only permit development in or near conservation areas that will:

At the end it would be useful to add another bullet point (better still numbered sub paragraphs) -
"Existing pockets of inappropriate development within conservation areas or alterations that damage

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JK

the character it is desirable to preserve, restore or enhance will be encouraged to reduce or remove the damage caused by that former development.

Policy SP 12 – Conservation – last section – penultimate line
Consider as unsound (not effective)

Another example of that meaningless phrase. What should be conveyed by this section is noted in the previous observation. In the case of the redevelopment of a nondescript site coming up for redevelopment near a sensitive site or area, the effect should at least be neutral on that asset.

Change considered necessary: Delete meaningless words.

Page: 143

Paragraph 6.2.5

Consider as unsound (not effective)

This is a nice way of saying that a lot of redevelopment in Haringey has not been good, and that in the 45 years of the Council's existence quite a lot must have passed through its hands as owner or planning authority. At the end of the paragraph there is another instance if those trite words 'the highest possible quality of design'

Change considered necessary: there should be a lead to those seeking redevelopment sites along the lines: Those estates and tracts of private development that do not meet 'high quality design standards' and even worse are poor in their environmental performance will be encouraged to be redeveloped to give buildings that are energy efficient and create a safe and pleasant place to live and work.

Page: 146

Paragraph 6.2.13

Consider as unsound (not justified)

There is a concern that the type and style of redevelopment at Tottenham Hale, flowing from what already exists there and the large retail sheds on the North Circular Road in the adjacent Borough have already sown the seeds for the irreversible decline of the Historic Corridor. The inspector is asked to consider whether the policies are strong enough on developing PPS5 themes of heritage led regeneration. It is arguable that former predictions for shopping growth are now false in present circumstances and that there may need to be a planned cull in large retail parks and subtle surgery on traditional or linear town centres to ensure their viability and survival as places that are desirable places to shop in, provide the services needed and make a good and satisfying day out. At present people have their days out by driving to parks of retail sheds and resort to the old centres for fringe activities or more local needs.

Hence this paragraph may be at odds with the last part of policy SP10.

Change considered necessary: The inspector is invited to consider whether the assumptions for more comparison floorspace are still valid, whether it is Tottenham Hale is already damaging the High Road, and thus whether the development at Tottenham Hale should be coupled with interventions in the High Road to make the High Road more attractive with housing and commercial development at Tottenham Hale with local shopping in place of the present plethora of large outlets as the way to shape that opportunity area, and reinforce the historic corridor as the place to go for a good experience. To do this it may need subtle surgery to make it function more like a purpose built shopping centre. This has been done in historic cities and could be achieved in Tottenham. The relationship to and contents of Wood Green as a metropolitan centre needs to be considered with this issue. The centres are close enough to be in competition. Their facilities should complement not fight the other.

Page: 147

Policy 11 & 12 indicators panel.

Consider as unsound (not effective)

378
21/6/6.1

Sixth point - This is probably an unwise indicator as Appraisals recently published have not been produced in accordance with EH guidance and have been badly received. It is better not to do them and rely on national, London Plan and Core Strategy policy than do them badly.

Change considered necessary: delete indicator

Seventh point - This is a stupid indicator. Most structures worthy of listing are probably already listed only late discoveries, buildings of more recent provenance that are now being recognized for what they are and omissions should now be listed. Resources are stretched to manage those listings and designations currently in place.

Change considered necessary: delete indicator.

378 (16) 21/6/6.1

Policy 11 & 12 indicators panel.
Consider as sound

not part of
Council's strategy

Eighth bullet point - This is supported, but it is understood that the two CAs noted as at risk were added because of local action informing EH as the Council failed to make a return. By under-resourcing conservation staff and enforcement most of Haringey's CA's SHOULD be on the Register. This is therefore an indicator likely to go the wrong way.

Change considered necessary: this is a management issue not one for the strategy. Sufficient resource needs to be put into the development management process to ensure these areas are enhanced through development and not damaged by inappropriate development. This means enforcement and intervening early when poor applications come in.