

HARINGEY CORE STRATEGY, May 2010

Comments on the Council's Proposed Submission

From Colin Marr on behalf of the 'Crossover Group' – an informal cross-Haringey group of residents concerned about the proliferation of vehicle crossovers and parking in front gardens to the detriment of the environment and the street-scene.

The following points are given in the order of the Core Strategy:

POINT 1

Section/ chapter/ policy	Design 6.1/ Landscaping and public realm
Page/ paragraph	140/ 6.1.13
Intention: support/ object	Qualified support
Soundness/ legality	Sound

191
11/11/11

Comment:

Paragraph 6.1.13 relates to the important role of trees and other greenery in the attractiveness and character of our surroundings. This paragraph is supported but, we suggest it needs to be further strengthened. In recent years one of the biggest detractors to the public realm and the street-scene has been the loss of front gardens and walls to car parking with associated damage to the environment and habitats for wildlife.

It is suggested that the final sentence should include a reference to front gardens by the insertion of these words so that **the final clause should be worded:**

... to provide a high standard of hard and soft landscaping, of boundary features such as walls and fences, and front gardens.

11/2/12

POINT 2

Section/ chapter/ policy	Design 6.2/ Conservation
Page/ paragraph	142/ SP12
Intention: support/ object	Qualified support
Soundness/ legality	Sound

192

Comment:

The overall Policy Statement SP12 includes as its second bullet point a commitment to preserve and enhance Conservation Areas and their settings. We welcome and

support this statement but note that it doesn't provide the necessary level of commitment for it to be effective in countering the loss of front gardens and walls.

English Heritage has encouraged Councils to adopt more effective measures to protect "important details such as windows, doors and front gardens". The measure to secure protection of these aspects is by making more use of Article 4 Directions, which suspend permitted development rights.

To encourage the Council to make greater use of Article 4 Directions (as recommended by English Heritage), we suggest an additional bullet point in the table on page 147, headed "Indicators to monitor delivery of SP11 and SP12" - **this to be worded as:**

- **Increase the usage of Article 4 Directions to protect features such as front gardens and front walls.**

POINT 3

Section/ chapter/ policy	Safer for all/ 6.3/Open Space and Biodiversity
Page/ paragraph	149/SP13
Intention: support/ object	Qualified support
Soundness/ legality	Sound

Handwritten notes:
14/11/13
201

Comment:

The opening statement of SP13 refers twice to "New" development. Although the principle of this statement is supported, we object to the word "new" and would prefer the statement to refer to "All" development. **We suggest the word "new" be deleted.**

In recent years one of the biggest assaults on open space and biodiversity has been the paving over of front gardens for car parking with associated damage to the environment and habitats for wildlife. We would like to see greater recognition of this in SP13.

We suggest the final clause of the first bullet point should be reworded to include the word 'gardens': Green Chains, gardens, allotments and other open spaces from inappropriate development.

In Point 2 above in relation to SP12, we commended the greater use of Article 4 Directions. This is equally valid in relation to Open Space and Biodiversity – in consequence:

We suggest an additional bullet point in the Strategy Statement on page 150, to be – The Council will.... through:

- **Increased usage of Article 4 Directions to protect features such as front gardens.**

Also related to this point is paragraph 6.3.4 on page 151. We welcome and support the reference to “back and front gardens” in this paragraph.

POINT 4

Section/ chapter/ policy	Appendix 1/ UDP Saved Policies
Page/ paragraph	205/ Parking for Development
Intention: support/ object	Object
Soundness/ legality	Probably unsound

11/4/2016
206

Comment:

The stated intention here is that UDP Policy M10 should be superseded by DMP12, Protection of Front gardens and Private Off-Street Parking. Because M10 is a narrowly based strand of policy relating only to parking for development it is reasonable for it to be subsumed into a wider policy management statement. However, we have serious reservations about the adequacy of DMP12 (see Point 5 below) and **our objection here is simply to register that we will be submitting more structured comments when DMP12 is subject to formal consultation.**

POINT 5

Section/ chapter/ policy	Development Management Policies DMP12/13 Parking for Development/ Protection of Front Gardens
Page/ paragraph	25 to 44
Intention: support/ object	Object (with support for parts)
Soundness/ legality	Unsound

Comment:

The provision and management of car parking in new developments and in the public realm generally, calls for close integration of policy and management across Council departments. In recent years this has been highly problematic with conflicts of interest between Planning, Conservation, Transport and Highways. The net result has been a failure to respond adequately to the deterioration of the environment and street-scene from the practice of front gardens being used for car parking.

Producing the Development Management Policies to address these issues gives an opportunity to draw together previously separate strands of policy. An attempt to do this is evident in pages 25 to 44 of the volume of DMPs, but falls short of providing clarity! These pages contain two sections both of which are headed DMP12 and two headed DMP13! They are a confusing mixture of technical guidelines (e.g. 3.18 to 3.57) and broad policy statements (e.g. the panel above 3.67).

Some of the wording in the policy statement is welcomed and supported, e.g. “Front gardens are greatly valued and they play an important role in London’s eco system...” and “The Council will only support the creation of additional private on-site car parking that will not have negative impacts on parking, highways or the environment.”

No reference is made to the current SPG1b (Parking in Front Gardens) and presumably the intention is that this will be superseded by one of the DMPs. SPG1b has some merit and we would like to see more of it incorporated into the relevant DMP. SPG1b includes the statement: “Parking in front gardens is generally unacceptable and will not normally receive planning permission” – we would like to see similar unambiguous statements in the DMP.

In conclusion, as currently drafted the DMPs 12 and 13 on pages 25 to 44 are unacceptable. We look forward to developed versions of these DMPs when they are available for further consultation.

Colin Marr (On behalf of the Crossover Group)

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18 June 2010