



ENGLISH HERITAGE

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Date: 24th June 2010

Dear Ms Whelehan

London Borough of Haringey
Core Strategy – Proposed Submission May 2010

Thank you for your email dated 10th May 2010 inviting comments on the Core Strategy Submission version consultation document.

As the Government's adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and therefore welcomes the opportunity to comment on this key planning document.

Having reviewed this document it is our opinion that the submission Core Strategy is considered **unsound** for the following reasons:

- Poor transparency in the evidence available to support the Core Strategy, both relating to the establishment of character areas, and regarding the management of tall buildings (PPS1, paragraph 19, and to be considered 'justified' as defined by PPS12)
- Inappropriately drafted heritage policies that do not provide a sufficient framework in which to protect and enhance all of the Boroughs heritage assets, encourage heritage-led regeneration or recognise the value of the local historic environment in its contribution to the sustainable development of the borough (PPS1, and PPS5).

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Correspondence or information which you send us may therefore become publicly available

We have provided detailed comments in the attached appendix (see below) to address these issues, and to strengthen the document as a whole in regard of the historic environment. However, we would like to make the following general comments here in relation to concerns of soundness.

General comments

Evidence base

As noted previously in our response to the Preferred Option (letter dated 30 June 2009), there is currently no clear design-led evidence base for the establishment of character areas or growth locations within the borough. We note that, at a strategic level, the growth locations identified in the Core Strategy are those set out in the *Draft Replacement London Plan* as Opportunity Areas and Areas for Intensification where Local Authority are required to seek to optimize residential and non-residential densities. However, at a local level, this optimisation process needs to be informed and refined by an understanding of local character, as required by PPS1 (paragraph 19), which requires that plan policies should be based on:

- up-to-date information on the environmental characteristics of an area;
- the potential impacts, positive as well as negative, on the environment of development proposals (whether direct, indirect, cumulative, long-term or short-term); and
- recognition of the limits of the environment to accept further development without irreversible damage.

In regard of the historic environment in particular, PPS 5, (policies HE2.1 and HE3.1) requires that local plan-making should be informed by an adequate level of detail, in order that local plans can take account of the contribution made by the historic environment to the character of the environment and an area's sense of place. This includes the need to demonstrate understanding of the type, numbers, distribution, significance and condition of heritage assets and the contribution they make to the Borough's environment now and into the future.

In the current absence of such evidence, the core strategy does not currently provide a sufficiently robust rationale for its growth locations or its Area Assemblies, which appear to be defined in part by historic character.

We strongly recommend that the Borough carries out a borough-wide characterisation study to provide a robust evidence-base for the identification of tall buildings and growth areas. Such studies are being carried out by a number of boroughs across London and are being used to provide valuable design evidence in support of growth proposals.

The study may not need extensive new research. As a first step we would advise that an audit of existing evidence regarding urban design and the historic environment is analysed, such as conservation area appraisals, area-based urban design work and other relevant documents. The study should identify topography, urban form, typology, historic development and any other environmental considerations which might influence the spatial and design policies within the Core Strategy.

English Heritage has recently published *Understanding Place* which provides useful information and guidance on historic characterisation. This is available at: <http://www.english-heritage.org.uk/publications/understanding-place-intro/> .

In addition, in collaboration with CABI English Heritage has also published *Building in Context* which provides case study-based urban design guidance showing how new developments can respond positively to historic context. This is available at <http://www.building-in-context.org/> .

Tall buildings

It is not clear from the information provided what evidence has been used to inform the strategic approach to tall buildings within the Core Strategy. EH/CABE *Guidance on Tall Buildings* recommends that Local Authorities should provide a proactive, plan-led approach to tall buildings, setting out which areas are appropriate, inappropriate and sensitive to tall buildings. Where tall buildings are supported, this should be based on an explicit design-based rationale underpinned by appropriate urban design evidence and on up-to-date information on the environmental characteristics of an area (PPSI). This information should be publicly available. Where there is insufficient evidence to set out a borough-wide approach to tall buildings, the EH/CABE guidance recommends that the borough as a whole should be identified as being 'sensitive' to tall buildings. More detailed tall buildings policy can then be articulated through the LDF based on up-to-date evidence.

A plan-led approach to tall buildings is currently set out in paragraph 6.1.17 of the supporting to policy SPII Design. Here, Haringey Heartlands/Wood Green and Tottenham Hale are identified as being suitable for tall buildings because they are identified as an Opportunity Area and Area for Intensification in the London Plan. We strongly advise that this plan-led approach should be based on identified environmental characteristics of an area, rather than simply on London Plan designations which identify where tall buildings *may* be appropriate. It is important that any plan-led approach is set out clearly in the wording of the policy itself, and in the event that there is insufficient evidence to provide a plan-led approach, the borough as a whole should be identified as 'sensitive' to tall buildings, supported by an explicit commitment to further detailed policy coverage through the LDF, for example, through an SPD. Alternatively, if it is the Council's aspiration to direct tall buildings to certain locations then only those areas identified as having the potential for tall buildings should be classed as 'sensitive' to tall buildings, whilst the remainder of the borough should be considered inappropriate.

The Historic Environment

As the Government's advisor on the historic environment, we wish to draw your attention to the publication on 23 March 2010 of *Planning Policy Statement 5 Planning for the Historic Environment*, and its accompanying *Planning Practice Guide* which provides further advice.

The Government's objectives set out in paragraph 7 of PPS 5 recognise the wider social, cultural, economic and environmental benefits of heritage conservation, their contribution to local character and role in place-shaping, as well as the need to conserve heritage assets in a manner appropriate to their significance.

At the same time the Government's *Statement on the Historic Environment for England (2010)* was published. This reinforces the Government's commitment to the Historic Environment, its contribution to the sustainable development agenda and that it should be afforded an appropriate and effective level of protection (see:

http://www.culture.gov.uk/reference_library/publications/6763.aspx). PPS5 supersedes guidance for the historic environment contained in PPGs 15 and 16. The comments on the current consultation document are provided within the context of the new national guidance.

Some of the key policies that are particularly relevant to the Core Strategy are:

- Policy HE1 addresses the issue of climate change in the context of the historic environment.
- Policy HE2 addresses the need to have a robust evidence base about the historic environment for plan-making including the broad level, such as landscapes, as well as heritage assets. The Historic

Environment and Heritage assets are defined in Annex 2. *Designated* heritage assets include listed buildings, conservation areas, registered parks and gardens, registered battlefields, scheduled monuments and archaeological priority areas.

- Policy HE3.1 which states that "local development frameworks should set out a positive proactive strategy for the conservation and enjoyment of the historic environment." HE3.1 indicates that plans should take account of the contribution made by the historic environment by virtue of (in brief):

- its influence on character/ sense of place;
 - its potential to be a catalyst for regeneration;
 - the stimulus it can provide for high quality new development;
 - the re-use of existing fabric, minimising waste; and
 - sustainable, mixed and flexible settlements and land use.

- Policy HE3.4 advises that LDFs should "consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the local development framework core strategy. Heritage assets can be used to ensure continued sustainability of an area and promote a sense of place. Plans at a local level are likely to consider investment in and enhancement of historic places, including the public realm, in more detail. They should include consideration of how best to conserve individual, groups or types of heritage assets that are most at risk of loss through neglect, decay or other threats."

- It is also important that the 'hierarchy' of heritage assets based upon an understanding of their significance (see terminology) is understood. Policy HE7 relates to all heritage assets, including undesignated assets. This reinforces the need to have an understanding of both the designated and undesignated assets in the Borough. Where something has been positively identified as being a heritage asset, the effect on its significance becomes a material consideration in determining a planning application (HE8.1). Policy HE9 sets out additional principles for determining planning applications in relation to designated heritage assets; it also includes nationally important, but undesignated archaeology (HE9.6). HE9 also distinguishes between different degrees of harm to a designated asset (HE9.1, HE9.2 and HE9.4).

- Setting is covered in Policy HE10; as well as protecting setting, HE10.2 indicates that LPAs "should identify opportunities for changes in setting to enhance or reveal the significance of a heritage asset". There are also other references to setting, such as in HE7.1 and HE8.1.

- Policy HE5 covers monitoring and the need to measure effectively the impact of policies and decisions on the historic environment.

Many of the detailed comments set out below have been made in order to ensure that the Core Strategy conforms with PPS 5.

We hope that these comments prove helpful to you in achieving sound policies regarding the historic environment within the Core Strategy. We suggest that it would be useful to follow up this response with a meeting to discuss evidence base and other issues we have raised here. We also look forward to an opportunity to comment on the Sustainability Appraisal of the Core Strategy DPD in due course.

As previously advised English Heritage would strongly advise that the Borough's own conservation staff are closely involved throughout the preparation and implementation of the Core Strategy, as

they are often best placed to advise on local historic environment issues and priorities, sources of data and consideration of options relating to the historic environment.

This opinion 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 arise from this or later versions of the plan which is the subject to consultation, and which may have adverse effects on the historic environment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nick Bishop', written in a cursive style.

Nick Bishop
Regional Planning Advisor
LONDON REGION

Appendix – detailed comments

Page	Comment
5	<p>Supporting evidence</p> <p>The evidence base does not currently provide any understanding of borough-wide character, including the contribution made to it by the historic environment. This is a requirement of PPS5, policies HE2.1 and HE2.3. We strongly recommend that the borough produce a characterisation study to provide an evidence-base for the Core Strategy policies which follow (see general comments in the main body of our letter).</p>
14	<p>Making Haringey distinctive</p> <p>The current spatial portrait does not sufficiently draw out the contribution made by the historic environment to the borough's local distinctiveness. To address this, we recommend that the 4th bullet of <i>Haringey's places</i> identifies the number of each type of heritage asset across the borough (listed buildings, conservation areas, scheduled monuments, registered parks and gardens, archaeological priority areas). This will give a much more accurate picture of the borough's rich historic environment in order to fully meet the requirements of PPS12, paragraph 4.2.</p> <p>In addition, we suggest that the fifth bullet of <i>Haringey's places</i> identifies townscapes within the borough which have a particularly strong historic character. Historic townscapes are important borough assets which make a significant contribution to the borough's economic competitiveness and the quality of life of its residents. These values should be presented here to help frame the policies in the Core Strategy and other DPDs.</p>
16 - 38	<p>Haringey at a glance</p> <p>While we recognise the political logic of structuring the borough into administrative boundaries (area assemblies) in order to identify local need, this approach does not sufficiently reflect the environmental characteristics of the Borough. As noted above (see main body of this letter), characterisation should be based on the identified environmental characteristics of a locality, rather than on pre-existing administrative boundaries.</p> <p>We strongly advise that a characterisation study is conducted as a robust basis for the sub-division of the borough into character areas, including due consideration of the borough's historic evolution. The study can then be used to fully identify the historic characteristics of each area which are currently limited in places. For example, the Crouch End Area Assembly description on page 21 does not give any sense of the strength of character and identity formed by Crouch End's historic environment.</p> <p>In all cases it is important that historic character be identified based on robust evidence as this sets the context for local priorities and management of change to the historic environment. Opportunities regarding the historic environment should then be drawn out within the Opportunities sections.</p>
39	<p>Challenges facing Haringey</p> <p>Conservation of the historic environment is not identified as a challenge facing Haringey, yet there are currently 16 listed buildings (of which 4 are Grade II*) and 2 conservation areas (Clyde Circus and Scotland Green) currently identified as being at risk within the borough on English Heritage's register of Heritage at Risk. In addition, the borough faces the challenge of accommodating growth within its historic environment without harm to historic significance. While this is correctly recognised as a design issue, it is also a conservation issue which should be identified here.</p> <p>We suggest that the historic environment is added to the list alongside High quality design.</p>
44	<p>High quality design</p> <p>Reflecting previous comments, we recommend that this section is re-titled <i>High quality design and conservation of the historic environment</i></p> <p>A new paragraph should be inserted after 1.4.26 to identify the 16 listed buildings and 2 conservation areas currently identified as being at risk on English Heritage's Heritage at Risk register http://www.english-heritage.org.uk/protecting/heritage-at-risk/</p>

15/1/11
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	The paragraph should also identify the values of heritage to society which provide a rationale for conservation, for example, fostering common local identities to support community cohesion and underpinning the Borough's economic competitiveness.	
47	<p>Vision Statement for Haringey in 2026</p> <p>Reflecting PPS5, it is important that the Vision brings out more strongly the potential of the historic environment to be a catalyst for regeneration (PPS5 policy HE3.1) as part of sustainable growth, for example, industrial heritage at Haringey Heartlands. We suggest amending the second sentence of the first paragraph to read:</p> <p><i>'In Haringey Heartlands and Tottenham Hale the historic environment has provided the basis for successful new mixed communities with high quality social housing and community infrastructure.'</i></p>	15/6/15 5/33
49	<p>Key Principles</p> <p>We welcome the principle of reinforcing sense of place. However, we suggest that an explicit reference is made to historic environment's contribution to an area's sense of place. This reinforces the message that the historic environment is an integral part of the Borough's vision, rather than simply a generic design issue.</p>	15/7/15 5/85
51	<p>Strategic Objectives – Safer for all</p> <p>We would question the use of 'Safer for all' as an objective which encompasses design and the historic environment. This title buries the historic environment as an issue and we therefore recommend that the title 'Safer for all' is amended to more accurately reflect the objectives which follow.</p> <p>We welcome an objective addressing the historic environment (fourth objective). However, we suggest that the objective be reworded for consistency with PPS5 terminology. We suggest:</p> <p><i>'To conserve the historic significance of Haringey's heritage assets and historic environment.'</i></p> <p>Please refer to the main body of this letter for a full explanation of PPS5 terminology.</p>	15/8/15 5/36
54	<p>Haringey's Growth Areas</p> <p>The Growth Areas identified are based entirely on the Draft Replacement London Plan designations. There is no consideration of local environmental characteristics or environmental development limits (PPS1 paragraph 19) as the basis for growth area location and capacity. We advise that a borough-wide characterisation study should be undertaken to help identify the capacity for change in the identified growth areas (please see also the main body of this letter).</p>	15/9/21 5/97
59	<p>SPI - Managing Growth</p> <p>To reflect PPS1 paragraph 5 this policy should be reworded to require that all development responds to its context irrespective of its location and as a contributor towards sustainable development. The current wording implies that this only needs to be the case outside of Areas for Intensification, however all growth areas can be sensitive to inappropriate development and design. Therefore it is crucial that local context and character is explicitly identified and used to inform change.</p> <p>We welcome paragraph 3.1.5 of the supporting text which makes this point.</p>	15/10/31 604
61	<p>The Council's aspiration for Haringey Heartlands includes:</p> <p>We recommend that the third bullet is expanded to read <i>'Physical and visual integration of the Heartlands with the wider area to benefit...'</i></p> <p>We agree that integration of Haringey Heartlands into the surrounding context is key to its success. However, it is important to stress that successful integration is dependent not only on strong physical links between existing and new communities but also on smooth character transition between them.</p> <p>The list of Council's aspirations should also reflect the opportunity for industrial heritage-led regeneration as identified in paragraph 3.1.9. We suggest the aspiration could be expanded to that design solutions respect the historic industrial legacy.</p>	15/11/31 608
65	<p>Hale Waterside (Hale Wharf)</p> <p>We note that a mini masterplan is being prepared for the Hale Waterside site. We would welcome</p>	15/12/31 611

	the opportunity to feed into this document.
67, 70, 72	We look forward to further involvement in the development of the Wood Green, Northumberland Park, Seven Sisters and Tottenham High Road AAPs. It is essential that the historic environment is recognised as an asset for these areas in the each set of Town Centre aspirations. We would also hope to see conservation of the historic environment and respect for historic context identified as an aspiration for well managed growth for each growth area.
75	Areas of limited change For consistency with PPS5 we suggest that paragraph 3.1.42 be amended to read; <i>'The Council will ensure that development in the areas of limited change respects the <u>historic significance</u> and character of its surroundings...'</i>
88-90	The page numbering is awry here.
91-97	Working towards a Low Carbon Haringey This section does not currently address climate change as it relates to the historic environment, particularly with reference to retrofitting and the establishment of decentralised energy networks. Climate Change is recognised as a priority issue in PPS5 (policy HE1). This states that local plans should ensure that a balanced approach is taken when weighing climate change objectives against conserving the historic environment. Policy HE1.3 states that: <i>"Where conflicts between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change should be weighed against any harm to the significance of heritage assets in accordance with the development management principles in this PPS and national planning policy on climate change"</i> Additional approaches include the retention of historic buildings as against demolition as a contributor to meeting climate change objectives. Their retention ensures that the embodied construction energy is not lost. English Heritage has published <i>Climate Change and the Historic Environment</i> (2006) to help identify potential impacts on the historic environment, available at http://www.english-heritage.org.uk/professional/advice/advice-by-topic/climate-change/
	SP4 – Working towards a Low Carbon Haringey This policy should provide a greater clarity with regards to achieving a low carbon Haringey and the need to conserve its historic environment. We suggest inserting an additional paragraph to set out the Council's approach to climate change mitigation and adaptation within the historic environment. For example, how would measure to improve energy efficiency be retrofitted into historic buildings? We would advise a balanced approach that is based on understanding historic significance of the asset, as set out in PPS5.
93	Low and Zero Carbon Buildings English Heritage have no record of reviewing the <i>Climate Change Site Development and Infrastructure Study 2009</i> . We would welcome the opportunity to review this document in order to ensure that locations identified for decentralised energy are not harmful to the historic environment.
94	Decentralised Energy Reflecting comments above, we suggest that paragraph 4.1.17 requires that proposals for decentralised energy networks have regard for historic environment objectives as set out in PPS5.
97	Existing housing stock Following earlier comments, we suggest that paragraph, 4.1.23 include a cross-reference with the historic environment objective HE1.3 to ensure that retrofitting measures have due regard for historic significance.
104	Key evidence and references Include PPS5 into the list of references to provide evidence for the climate change policy as it relates to the historic environment.
105	Public Transport

15/12/3-1
6X8

15/11/3-1
6X6

6X7

15/15/4-1

6X8
15/16/4-1

6X9
15/17/4-1

6X0
15/18/4-1

6X1
15/19/4-1

	<p>There should be an explicit reference to public realm improvements within the paragraph 4.4.4 reflecting the above guidance.</p> <p>Policy 14 of the <i>Mayor's Transport Strategy</i> (2010) identifies the Mayor's intention to, working with the London Boroughs, improve transport's contribution to the built and natural environment. English Heritage supports investment into the historic environment as part of transport improvements, and in particular into transport interchanges and historic streetscapes. English Heritage have produced guidance on public realm improvements in <i>Streets for All</i> (2006), available at http://www.english-heritage.org.uk/publications/streets-for-all-south-east/, which sets out a series of guiding principles on how to manage transport related change in the historic environment.</p> <p>In due course, we look forward to further involvement developing the Borough's transport approach in the <i>Transport Local Implementation Plan II</i>.</p>	15/20/4.1 62/3
117	<p>Protection and Enhancement of Existing Employment Sites</p> <p>Environmental enhancement and high quality design are an important part of enhancement to existing employment sites. To emphasise this point, we suggest inserting a cross-reference to the design policies outlined later in the Core Strategy.</p>	15/21/5.1 62/4
125	<p>SPI0 –Town Centres</p> <p>We suggest inserting a reference to investment into the public realm and historic environment in order to enhance town centre character as part of Protecting and enhancing Haringey's Town Centres. The current approach to protecting and enhancing the Borough's town centres is too narrowly focused on land uses and does not take account of the importance of continued public realm investment in maximising the historic environment's contribution to town centre vibrancy and vitality. Useful English Heritage guidance on these issues is available in <i>Retail Development in Historic Areas</i> (2005).</p> <p>This objective reflects PPS4 and the Government's support to conserve the historic environment as part of promoting vitality and viability of town centres (paragraph 10).</p>	15/22/5.3 62/7
128	<p>Protecting and promoting the Town Centres</p> <p>We welcome the cross references set out here to the Council's conservation area and development management policies. To assist this process, we suggest including cross-references to policies SPI1 Design and SPI2 Conservation.</p>	15/23/5.3 630
130	<p>Improving Our Town Centres</p> <p>In paragraph 5.3.22 insert an explicit reference to investment into the public realm and historic environment. Such investment is crucial in supporting the economic competitiveness of town centres by ensuring that their historic environments are maintained to maximise their attractiveness.</p> <p>Insert a reference to Wood Green's historic environment and character, as has happened with Bruce Grove/Tottenham High Road. This is important to frame earlier policies which promote investment into the public realm.</p>	15/24/5.3 631
136	<p>References</p> <p>Insert PPS1 and PPS5 as reference documents as these policy documents set out the requirement for policies to enhance environmental character and historic significance as part of sustainable development.</p>	15/25/5.3 632
138 - 139	<p>SPI1 - Design</p> <p>The first bullet of this policy should be amended to read: 'Be of the highest standard of design that respects its local context, character and historic significance to contribute to the creation and enhancement of Haringey's sense of place and identity;'</p> <p>This ensures that the historic environment is fully taken into account in new designs, as required by PPS5 policy HE3.1. This policy should explicitly set out a proactive, plan led approach to tall buildings (Please see earlier comments in main body of this letter). The Borough's approach to tall buildings is currently hidden within the supporting text, and is not based on robust evidence regarding the Borough's environmental characteristics, as required by PPS1. In the absence of such evidence, and following EH/CABE <i>Guidance on Tall Buildings</i> we strongly advise that policy SPI1 –</p>	15/26/6.1 633

	<p>Design identifies the borough as a whole as 'sensitive' to tall buildings, and outlines a commitment to further policy coverage within the LDF once an appropriate evidence base is available. Unless there are specific locations indicated for tall buildings, then these areas should be identified as 'sensitive' and the remainder of the Borough inappropriate. In all cases evidence is needed to justify the policy approach.</p> <p>High Quality Design We suggest inserting a reference to <i>Building in Context</i>, which supports developers and other planning professionals in delivering designs which have a real regard for local context and character.</p>	8/27/6.1 634
141	<p>Tall Buildings The rationale for tall buildings set out in paragraph 6.1.17 should be based on evidence of the environmental characteristics of the borough, rather than on growth areas identified by the London Plan. We strongly recommend that an appropriate evidence base is produce to justify strategic locations within the Borough where the Council deems tall buildings to be either appropriate or inappropriate for tall building (Please see earlier comments in the main body of this letter).</p> <p>Following EH/CABE guidance (paragraph 4.1) the Core Strategy should also provide a definition of tall buildings, either in paragraph 6.1.17, or in the glossary of terms.</p>	835 15/28/6.1
142	<p>SPI2 – Conservation In order to reflect the terminology used in PPS5, we suggest that this policy is reworded as follows:</p> <p><i>'The Borough will support proposals that conserve the historic significance of Haringey's heritage assets, their settings, and the wider historic environment. The Borough's heritage assets include Statutorily Listed Buildings, Conservation Areas, Registered Parks and Gardens, Archaeological Priority Areas, and other locally important heritage assets such as Locally Listed Buildings, Local Historic Green Spaces and Sites of Industrial Heritage Interest.</i></p> <p><i>Where archaeological excavation is required, findings should be published, disseminated, and used as the basis for archaeological interpretation on site.</i></p> <p><i>The Historic Environment should be used as the basis for heritage-led regeneration and as the basis for good design and positive change. Where possible, development should help increase accessibility to the historic environment.</i></p> <p><i>All development shall protect the Strategic view from Alexandra Palace to St Pauls Cathedral and key local views.'</i></p> <p>In addition, we note that the current policy SPI2 makes reference to 'Designated Sites of Industrial Heritage'. We suggest that this title is misleading as it could be interpreted to mean that such sites are covered by national statutory designation, which we assume isn't the case here. We look forward to discussing this issue with you in due course.</p>	15/29/6.1 637
143	<p>Haringey's Heritage The first sentence of paragraph 6.2.2 should identify a wider range of heritage values which the historic environment holds for the community, as this provides a more firm justification for conservation policy SPI2. Examples include supporting local economic competitiveness (by providing attractive places for people to live and work) and promoting community cohesion through shared culture and identity.</p>	15/30/6.2 641
147	<p>Strategic and Local Views (Paragraph 6.2.18) we look forward to future involvement in the development of the forthcoming Conservation SPD.</p> <p>Indicators to monitor deliver of policies 11 and 12 We suggest that the 6th indicator here is amended to read '<i>Complete Conservation Area Appraisals and Conservation Management Plans for each of the Conservation Areas within the Borough.</i>'</p> <p>The 7th bullet should be removed altogether.</p>	15/31/6.2 643 15/32/6.2 642 646 15/33/6.1

	<p>These recommendations draw on indicators suggested in our guidance document <i>Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment</i> (2010), available at http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1276835808. We question whether 'progressing' the conservation area programme provides an adequately quantifiable indicator. We also suggest that an increase in the number of buildings put forward for statutory listing does not necessarily provide an indicator of how well the historic environment is being conserved and can be misleading, for example, if heritage assets are put forward for listing for the wrong reasons.</p> <p>Key evidence and references References to Planning Policy Statement 15 should be replaced by a reference to <i>Planning Policy Statement 5 Planning for the Historic Environment</i> (2010), supported by the <i>Historic Environment Planning Practice Guide</i> (2010), set within the context of the Government's <i>Statement on the Historic Environment for England</i> (2010).</p>	15/24/6.2 6/27
148	<p>Open Space and Biodiversity The first paragraph (6.3.1) should identify the heritage value of the Borough's open spaces alongside the other values laid out here. The heritage value of the Borough open spaces is particularly important given that the Borough has 2 registered parks and no fewer than 34 Local Historic Green Spaces.</p>	6/29 15/35/6.3
149 - 150	<p>SPI3 – Open Space and Biodiversity We suggest that an additional bullet point be inserted to explicitly set out the Council's intention to conserve the historic significance of the Borough's open spaces. This will ensure that their heritage values will be protected for the community.</p> <p>A policy paragraph should be inserted to explicitly set out the Council's intention to conserve the historic significance of the Borough's waterways. This will ensure that the heritage values of the River Lee and the Moselle Brooke will be conserved for the community.</p> <p>Protecting our open spaces To reinforce protection of historic open spaces in line with PPS5 the last sentence of paragraph 6.3.3 should read:</p> <p><i>'The Council will only allow development on sites adjacent to an open space that respects the size, form and use of that open space and does not cause harm to its wholeness, appearance of setting, or harm public enjoyment or historic significance.'</i></p>	6/28 15/36/6.3
151	<p>Protecting our open spaces Paragraph 6.3.7 should identify the heritage value of waterways, providing explanation of the policy paragraph relating to waterways, as suggested for SPI3 – Open Space and Biodiversity.</p>	6/26 15/38/6.3
163	<p>SPI4 - Health and Well-being Insert a reference to the Council's support for a high quality environment as part of a cross-cutting approach to health and well-being.</p> <p>Paragraph 7.1.1 on page 162 identifies the benefits of high quality environments on health. Attractive historic environments are a part of this and as such should be supported with appropriate levels of investment through explicit policy support.</p>	6/28 15/37/7.1
175	<p>SPI5 – Culture and Leisure We suggest rewording point 3 to read "Protecting and enhancing, where feasible, existing cultural facilities and access to cultural heritage throughout the borough."</p> <p>Increasing access to cultural facilities is a policy approach set out in the draft Mayor's Cultural Strategy.</p>	7/21 15/40/7.2
194	<p>SPI7 Delivering and Monitoring This section should provide greater clarity on the status of current S106 policy which is currently set out in Supplementary Planning Guidance to the Unitary Development Plan.</p>	7/22 15/41/8.2

