

## **Haringey Local Plan – NPPF changes**

submission by Christopher J Mason.

Role: Secretary – Friends of the Parkland Walk

Date 13<sup>th</sup> June 2012.

### **Which matter /issue it relates to?**

Failure to interpret National Policy and that the changes confine themselves to name changes and do not include the changes necessary to make the Plan compliant with the NPPF.

### **Which particular part of the Local Plan is unsound?**

Lack of involvement with the Local community and lack of testing of a Proposals Map (PM) in respect of boundaries and notations.

### **Which soundness test (s) it fails?**

Is it not now consistent with national policy as set out in the National Planning Policy Framework?

### **Why does it fail?**

The schedule of changes relate to editorial changes and references to documents only and do not address the content changes necessary for compliance.

### **How can the core strategy be made sound?**

Reviewing boundaries and subjecting them to scrutiny by the stakeholders and public by publishing a draft Proposals Map.

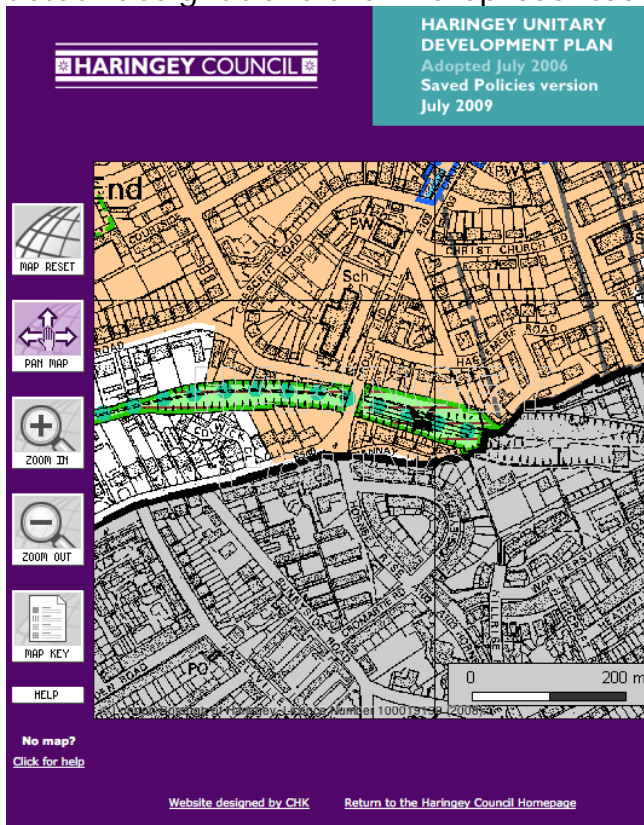
### **What is the precise change/wording that is being sought?**

Mapping of boundaries and the amalgamation of notations onto one fresh mapping base to allow adjacencies, consistencies and anomalies to be checked.

### **Discourse on soundness issues**

1. This matter has been raised before, but at the EIP hearings on 5<sup>th</sup> July 2011 it was surprising to hear the Inspector note that a Proposals Map could form part of the collection of documents that were then intended to become the Local Development Framework.
2. That situation has now changed as the new expectation is for the former Core Strategy to be the strategic part of the Local Plan. It will, in the end, be rather similar to local plans in the past, having a strategic part and then further development management policies by topic or subject area.
3. It therefore seems essential to have a PM as the identification of sites over the administrative area should be illustrated with the strategic thrust of this part of the plan. Management policies by topic do not need to be mapped as they are generally topic or subject driven, but the allocation of land or protection designations should be mapped across the Borough.

4. The last version of the proposals map is not available to the public on line as a pdf file that is a definitive reproduction of a paper document and instead the council has a link to [www.cartoplus.co.uk/haringey/](http://www.cartoplus.co.uk/haringey/) which is simplified and therefore can not be trusted to show the full complexity of designations.
5. Take, for example, the section of the Crouch End area south of Crescent Road and Haslemere Road. The buff notation for a conservation area is not visible over the parkland walk in that area, but comparison with the last printed version and the conservation areas map available on line shows the parkland walk to have all the 'green' designations (MOL / Nature reserve, green changes site of ecological interest of Metropolitan importance) AND it is a conservation area indicating it is of architectural or historic interest.
6. The Cartoplus map shows it to be just the 'green notations' noted above with buff conservation area status either side. Thus the actual designations are misrepresented.



7. This raises the matter of whether a former railway formation with structures largely rebuilt actually has any credibility as an area of architectural or historic interest. It is arguable that the embankments and cuttings as a formation of Industrial archeological interest may be, but if that is the case then it seems appropriate that the designation should be linear, continuous and not related to the built up areas that flank it (it was generally built through fields when constructed in the mid 1860s).
8. The NPPF in paragraph 127. states: *'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special*

*architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'* It is arguable that the earthworks and altered bridges are not worthy of the conservation area status afforded to the historic terraces, villas and public buildings of the urban world, unless one takes the archaeological approach noted above, and the Walk should not be undesignated in one place and designated in another. The Nature Conservation and Open Land designations should be protection enough for those purposes. In this respect the impression given by the Cartoplus mapping may actually be a more appropriate notation of how it should be.

9. There is little of architectural interest (apart from the St James's Lane viaduct and Highgate Station buildings) so the patchwork of part designation should be reviewed so it is in compliance with para 127 of the NPPF.
10. There is also the unresolved issue of changes made to the Metropolitan Open Land (MOL) boundaries (and should that now be amended to 'Local Green Space' as this seems to now be the National Notation for land not in a green belt but of significant significance in the country as a whole?) and seems to be the same role as MOL as defined in the GLDP of 1976 and noted in the first Haringey Plan after that in 1982.
11. To the Friends of the Parkland Walk knowledge the MOL boundary was first defined in the 1982 Plan and there has been no debate about changing any of its boundaries since. It is noted that there are boundary changes (un-debated and not discussed) in subsequent versions of the PM and some of these relate to what the Friends of the Parkland Walk feel are 'fiddles' around land disposals by the Council.
12. At the EIP in 2011, it was revealed that devious transactions have taken place by Haringey as a body corporate and these were not subjected to any boundary review in respect of MOL or nature reserve. No planning permissions appear to have been sought to regularize the changes of land use. In two cases inappropriate development has been allowed without being dealt with as a departure from the Local Plan when development has been considered on land that is MOL according to the 1982 boundary but through un-debated mapping changes may have been considered as ordinary urban land in error.
13. The net result is that Metropolitan Open Land that is also Nature Reserve and Ecological site of Met Importance has been sold or leased as garden extensions or residential development for the income generation potential afforded by so doing to the Council. As recently as 2009, it was re-affirmed by the Cabinet to renew leases where they had lapsed, perpetuating this inappropriate process.
14. In planning terms the lack of process in respect of land use change will quietly regularize itself after ten stealthy years, as the use as

garden continuously will make the use lawful without the need for a formal application that would have attracted attention.

15. The Friends of the Parkland Walk fear that a devious slip of the mapped boundary will then cement these disposals and affirm the Nature Reserve to residential garden change irrevocably.
16. In the interests of transparency the Friends of the Parkland Walk expect to have engagement in this matter – para 155 of the NPPF expects *“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”*
17. Haringey has consistently swept this matter aside and one colleague had her representation allocated to other consultations in order to bury the embarrassment this caused.
18. In the light of the NPPF being activated in March 2012, it is now considered that the Haringey process is flawed and in respect of the Parkland Walk a proposal map is necessary, the stakeholders should be engaged in the mapping and it should be subject to public scrutiny. In accordance with para 127, the anomalies of nature and building conservation need to be resolved and a consistent designation applied to all the Walk.
19. Should it be necessary to accept some areas as irrevocably lost, then there should be recompense by designation of new areas of MOL where they are contiguous with the Walk and contribute to its unique presence in the city.
20. The respondent has produced a Proposals Map as direct output from a GIS system and it was accepted in A3 format as a Gazetteer of small maps with a key map (A-Z style) – it need not be a hugely expensive lithographed map, and it is considered that the penny pinching by the Authority over this matter is undermining the community involvement, muddying murky issues of land transactions the authority would rather keep quiet and is not producing a sound and justifiable Local Plan as a result.
21. The Inspector is therefore requested to:
  - Require the production of a PM as part of the re-worked Local Plan (Strategic Part)
  - Require stakeholder engagement and consultation on it (para 151) and Statement of Community Involvement
  - Consider the designation as an Industrial Monument / earthwork in lieu of bits being linked to later urban development,
  - Require the designations to be reviewed to be sensible and consistent and relevant as required by Para 127, and
  - Clarify the MOL / Local Green Space notation and extent (to be consistent with the London Plan Chapter 7 and / or Para 76 of the NPPF).