

SC 1 – COMMUNITY INVOLVEMENT

39

HARINGEY LOCAL DEVELOPMENT FRAMEWORK - DRAFT CORE STRATEGY

10's
4165, 4167, 4168, 4169, 4170, 4171

Comments from the Highgate Society, 10a South Grove, Highgate N6 6BS

4172, 4173, 4174,

Contact – Michael Hammerson, Vice-President and Chairman, Environment Committee.

4175, 4176

The Highgate Society is the Civic Amenity Society for the wider Highgate area, with over 1,400 members. It has been engaged in local planning issues for over 40 years, and works with and submits representations to the local authorities within whose area Highgate falls – Haringey, Camden, Barnet and Islington.

4177, 4181

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(Note: Owing to the very inadequate period of public consultation available for local residents and other amenity groups to comment on these complex documents, and in particular for them to be able to consult and circulate their specialist committees and wider membership and give them adequate time to consider and comment upon these critical documents, we are focussing on a narrow range of issues of particular concern for the Highgate area. The absence of comment on other issues does not imply either agreement or disagreement with what will be equally important issues on a wider scale, but what has effectively become a three-week period for comment does not enable effective and full public participation).

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Figure 1.4, page 17: Area Assembly Composite Map

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(1) This is inadequate in that it does not indicate Metropolitan Open Land (e.g. the playing fields within Bishopswood Road, N.6) or designated Private Open Space.

(2) It contains errors or inconsistencies. For example:

- Highgate Village (or, more correctly, the half in Haringey) is described on p.38 under "Opportunities" as a District Town Centre", but is not shown as such on this map, or on the more detailed Fig. 1.11, page 37), and Fig. 5/2 (p.127) designates it as a "Local shopping centre". Section 5.7 of the DMP document likewise does not designate it as such.
- Highgate Golf Course (south-west corner of Borough) is shown as Public Open Space, whereas access is in reality only for members (also on Figure 1.11, page 37).
- Alexandra Palace and Park are shown only as a Conservation Area, not as the predominantly public open space which they are.
- The areas of "Public open space" are shown in two shades of green, but the key does not distinguish between them (also on Fig. 1.11, page 37).
- The key designates areas edged in blue as "Town Centres", but the individual centres on the map are described as "District Centres" (also on Fig. 1.11, page 37).
- The key does not indicate what the black lines are; we presume they indicate the divisions of Area Assemblies (suggested by the later individual Assembly area maps).

1.3 MAKING HARINGEY DESTINCTIVE

Muswell Hill Area Assembly

We are unclear as to the validity of the formal designation in planning or administrative terms of the "Muswell Hill Area Assembly." It comprises four electoral wards, but is, as far as we aware, merely a title given to the quarterly informal consultative meetings held for residents of the wards, and which has always been made clear to us by Haringey is a temporary arrangement subject to regular review. It appears to us, therefore that the "Area Assembly" has no administrative validity.

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1.3.34. Line 1 – "comprises of" is grammatically incorrect. Delete "of".

1.3.35: We consider this a gratuitous, uninformative and, as it stands, unhelpful comment. The statement that the area "is considered [our italics] the more affluent part of the Borough" is subjective, appears to have no objective other than, we would be concerned, a political one, and should be either expanded to explain its purpose or deleted as unsound. For example, there are a number of council-owned blocks of flats in Highgate, the status and income levels of whose residents relative to those of other Haringey tenants is not referred to. It also implies that there are no other problems in the area, whereas examples such as severe traffic congestion from being on two main through routes, and two declining and struggling shopping centres (Archway Road and Highgate Village, the former in severe decline through Haringey's consistent failure to implement the two versions of its Archway Road Neighbourhood Plan produced over the past decade, and the latter with the additional burden of being split between two local authorities and therefore marginalised by both) can be cited as two.

28/5/1.3

1.3.36. Alexandra Palace was not opened as "The People's Palace", but as Alexandra Palace. It was popularly known as such.

4.70

1.3.37. This section is totally inadequate as a set of objectives for the area, and therefore unsound.

b.p.1 - While local residents are happy to participate in such initiatives - and have come to realise that, without their proactive participation, no action will be taken to improve the public realm - we consider that it is unsound to predicate a formal public realm improvement policy on "resident-led street audits". Any policy should be formally enshrined in Haringey's programme, with the harnessing of resident assistance as means to achieve the end rather than, as it seems, leaving the outcome to residents' willingness to carry out the work. This is an unacceptable abrogation of formal policy and is unsound.

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b.p.2 - The term "isolated estates in Highgate" is unclear, either as to why they are "isolated" or why being in Highgate - already described 1.3.35 as "affluent" - should make them isolated, if they are under Haringey's management in the same way as other estates in the borough and, if it is the case, why Haringey have allowed them to become so. Indeed, we consider it contains an underlying implication that they are marginalised by the rest of the community because they are council-owned; if the inspector agrees that this could be read as the insinuation, we consider the statement not only unsound but untrue and unacceptable.

b.p.4 - This inadequate token gesture to minor improvement of "local community facilities" is symptomatic of Haringey's lack of will, long experienced by residents in the "Assembly" area, to address the real concerns and issues which local residents have repeatedly communicated to them, at Assembly meetings and in other ways, including:

- degradation of the public realm through lack of liaison between highways and conservation sections;
- failure to recognise and assist with the major problems facing businesses in the area (see Archway road Neighbourhood Plan comments, above);
- failure to co-ordinate with Camden on planning, policy or conservation issues in the core Highgate village area;
- failure to support improved public transport links for the west part of the Borough;
- repeated failures in the area of town planning, including inconsistent decisions and major failures of enforcement.

We therefore consider this section inadequate, poorly thought out, failing in that it has clearly not been informed by the concerns expressed over a long period by residents and residents' groups in the Assembly area, and therefore signally unsound.

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Page 38:

Places: This is incorrect. Highgate Wood is not only also a Green Flag Park (awarded every year since the awards were initiated) but a Green Heritage Flag park.

Opportunities: While we welcome the acknowledgement that Highgate District town centre must receive improvements, the policy must also embody commitments to:

- liaise closely in policy and planning terms with Camden, since the boundary between the two Boroughs runs down the middle of Highgate High Street, an arrangement which has worked to the major disadvantage of Highgate's ability to function as a coherent retail and business centre;
- secure major improvements to the retail area of Archway Road, shown on Fig. 5.2, p.127, as seemingly the largest such centre in the Borough. It is in severe decline and further disadvantaged by being split by a Red Route the management of which does not take account of its function as a community serving a large residential area on both sides of the road, through implementation of the Archway Road Neighbourhood Plan.

28/7/4 4

4.4. SP7 - TRANSPORT

4.4.6 The Society strongly support the intention not just to improve east-west bus routes but also to promote new ones.

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4.4 Section : Delivering Action on Climate Change and Quality and Healthy Places It is difficult to understand the meaning of the policy of "adopting maximum car parking standards". It is suggested that this is re-phrased so as more clearly to communicate the intention of the policy.

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4.4 A major contributor to the increase in car borne journeys is greater parental choice in selecting schools. It would be helpful if the LDF were to note this and to indicate whether the Borough has a view on the conflicting objectives of maximising parental choice and sustainability.

4.4 Another major contribution to the increase in car borne journeys is the decline in the attractiveness of many neighbourhood centres. It would be helpful if the LDF were to note this and to indicate what, if anything, the borough intends to do to assist in the revitalisation of smaller neighbourhood centres (of which Archway Road and Highgate High Street are good examples) in order to further its sustainability objectives.

4.4 The argument that the draft LDF makes for improving and increasing east-west bus routes could be strengthened by a brief explanation of some of the factors which are contributing to increased demand along these travel lines. For example it would be appropriate for the LDF to relate the Borough's policy of increasing the proportion of the Borough covered by CPZ schemes to the increased difficulty of shoppers finding a parking space within easy distance of retail centres and the consequential tendency for retail trips which used to be made by car now to be made by public transport; the greater distances travelled by school children as a result of increased parental choice; the provision of free bus passes to those aged over 60 and the decline of local neighbourhood centres. Each of these trends contributes much more to the demand for orbital than for radial bus services.

SP 10 – TOWN CENTRES

5.3.6. Whereas Highgate is referred to (see comments above) in p.38 as a District Town Centre, it is not listed as such here, and is thus impliedly one of the "38 local shopping centres" referred to in b.p.2. Clearly there is major confusion here as to the status of the Highgate shopping centre. This demonstrates a quite unacceptable lack of clarity at policy levels. The policy is therefore unsound in this respect.

5.3.10. The Highgate and Archway shopping centres are at the very western edge of the Borough, and poorly served by public transport in regard access to the main district centres. We therefore welcome the commitment in 5.3.11 to ensure that the growth of district centres does not harm local centres, and in 5.3.12 to ensuring appropriate shopfront design. However, shops are not the only buildings in such centres, and where they are Conservation Area. Thee commitment in 5.3.12 should therefore be re-worded:
"The design of shopfronts *and other new build or alterations* can contribute greatly to the character..."

5.3.13. We consider the statement that "residents without access to a car within areas poorly served by public transport... will have different needs to those who are mobile by car and enjoy higher incomes. Therefore the availability of local shopping facilities near to residential areas... may be more important to these former groups" to be seriously flawed. Not only do many people in Highgate, particularly the elderly, have no access to cars, either by necessity or by choice, but the agenda of reducing one's carbon footprint is taken very seriously in Highgate, and particularly the need to reduce car journeys. This agenda is therefore important to all, regardless of their income, a subject which appears to be harped upon in more than one place in this document. It embodies outdated stereotyped conceptions of a former age obsessed with class warfare, is divisive, endeavours to excuse Haringey's past failings in addressing the deplorable living conditions of significantly disadvantaged communities in some parts of the Borough, has no place in a modern holistic policy aimed at addressing such issues, and is therefore seriously flawed and unsound. The policy should be substantially reworded into a commitment to ensuring that both district and local centres are encouraged and helped to provide a level of service which will minimise the need for car-borne travel, and that public transport facilities to, and between, centres will be encouraged at a level which will enable people to reach their local centres without the need for cars, and will enable those shoppers who need to travel to more distant centres for services not available locally to have less need to rely on car transport.

5.3.16. While we support the aims in this paragraph, we also consider it essential that there should be a specific policy of resisting changes of use class from retail to other uses, unless there is clear evidence that the vacancy is a long-term one and that all reasonable measures have been taken to secure a retail tenant. The absence of such a policy in Highgate has resulted in some 20% of the shop units in the High Street becoming Estate Agents – a result for which both local authorities are equally responsible – and this in turn exacerbates the upward spiral in retail rents. What is needed in centres such as Highgate is not "development of new retail locations", but protection of existing ones. 5.3.17 can help to address this, but needs to be more specifically focussed as regards solutions; in this regard, the past practice of weakly permitting change of uses from retail to higher-rent office and other uses is not "encouraging proposals that [which?] add to the vibrancy and chose of shops in the existing centres", and is unsound, unless supplemented by a policy such as that in our first sentence to this paragraph. While DMP 17 of the DMP makes reference to this, we consider that it should also be flagged up as an important element of the Core Strategy, as are preferred alternative uses, covered both here and in the DMP (5.14).

5.3.18. While we welcome this commitment, the preceding comments result from past experience that it has been a policy more honoured in the breach than the observance, at least in Highgate village. This is, in our view and experience, the result of weak planning control and ambivalent policies, and the policy, as worded, remains

weak. "Will seek" is not strong enough, and seeking to avoid "inactivity at certain times of the day" is surely a relatively minor consideration if the centre is otherwise flourishing. A much stronger commitment to protecting shopping centres, more certainly defensible at appeal, is necessary: the first sentence should be reworded: "A1 retail use is the primary function of a shopping centre, and the loss of retail to other uses progressively weakens the centre's viability. The Council will not permit any change of use from A1 within the primary frontage of a shopping centre unless it can be clearly shown that:

- there is a demonstrable need, and public support, for such a use in that location;
- that the change of use class will not threaten the overall viability of the centre as a retail centre;
- that reasonable efforts have been made to find a retail use, on terms similar to those under which comparable retail units in the centre are held, without success, and that a suitable retail use is unlikely to be secured."

5.3.19. While we appreciate the objectives of this, we consider it unhelpful – and also unnecessary if our above rewording is adopted. We also consider that window displays of non-retail uses will have only a cosmetic effect if the retail viability of the wider area is not safeguarded. We therefore consider that this is unsound and should be replaced by the suggested wording in 5.3.18 above.

5.3.20. While we acknowledge the problems of securing addition housing, not least in Highgate, we consider that:

- the statement that "intensifying residential development in town centres *could* [sic]...create natural surveillance" is flawed; in our view, it could have the opposite effect, or no effect, depending on design, locality and the nature of the occupants. The sentence is aspirational, not policy, is therefore unsound and should be deleted.
- the policy of intensifying residential development in centres which are also Conservation Areas conflicts with 5.3.11 and 12. The final sentence should conclude: "... and, particularly in areas of special character or protection, but as far as possible in all areas, should be of a scale and design which respects, preserves or enhances that character."

5.5.52. While we sympathise with the aspirations of this paragraph, it appears to be purely aspirational rather than policy. We do not see how "the trend towards fewer, larger shops" can be halted, and not having seen the 2008 Retail Capacity Study, are unclear in what form, and with what policy suggestions, "it has recommended that these local shopping centres are retained". If there are specific recommendations, a further sentence should be added. "Haringey will adopt and implement the recommendations of the survey for ensuring that local shopping centres are protected and revitalised."

6.1. SP11 DESIGN

6.1.2 – 6.1.6. While we support this policy, experience does not reassure us or, we believe, other local groups, that "highest standard of design" and "high quality design" will be insisted upon sufficiently rigorously. We believe it to be essential that there should be a firm commitment to ensuring that the local community should have sufficient opportunity to comment upon the design aspects of new development in their areas..

SP11, b.p.4 refers to "high quality public realm". A common failing, however, is that an insistence on excellence in new development is primarily a requirement on the private sector, and residents' past experience is, again, that works to the public realm, including highways, pavements, etc. are carried out without liaison with Conservation Staff, reference to CABE and English Heritage guidance, (e.g. as recommended in "Streets for All") or with adequate awareness of the principles of good streetscape design. The first sentence of SP11 (p.138) should commence: "All new development, both private and public, including works to the public realm, should enhance..."

In order to ensure that historic buildings and other heritage assets are adapted sensitively in the light of current requirements, a further bullet point should be added to the top three in the panel on p.139:

" – Ensure that adaptations of buildings and other heritage assets to accommodate these requirements should be carried out sensitively, and in accordance with up-to-date national guidance, in order to respect and, as far as possible, protect, the historic character of the assets."

It is likely that tall buildings will not be appropriate in any Conservation Areas. As currently worded, the final five bullet points appear to condone tall buildings in any location as long as they are of "high quality design", and no site in a Conservation Area may be appropriate, whatever its size or setting. We therefore ask that a rider should be added at the end of this section:

"It is, however, unlikely that tall buildings of any description will be appropriate in a Conservation Area, however excellent their design; tall buildings in such areas will therefore only be considered under the most exceptional of circumstances."

6.1.4. While we support this section, the Government's aspirations of increasing local people's ability to influence design and development in their areas, and the active role which Haringey resident and amenity groups and Conservation Area Advisory Committees play in commenting upon the quality and appropriateness

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of development, requires a commitment within this policy to appropriate public consultation. While we appreciate that these community groups have no formal remit in the planning process, there has been much disillusionment on the part of local residents' organisations with the way in which their efforts to have positive input into the local planning process has been, in their view, marginalised by Haringey in the past. Haringey could validly enshrine a more effective form of community engagement within the policy, as an extension of what is already informally done by some of their planners. The Highgate Society has on many occasions been able to work with developers and applicants to produce schemes, some of which have been – by the applicants' own admission – better than the originals, and which can therefore go forward with public support, to the benefit of the whole planning process. We strongly believe that much local objection to development is because of this feeling of marginalisation or of not being listened to, and that a greater degree of community involvement will promote better understanding on the part of the community of the proposals, a better opportunity for the applicants to benefit from detailed local knowledge, and hence actually less resistance to change. We therefore propose a further section after 6.1.4.:

“Recognising the deep interest of the community in how their local areas are developed and improved, and the value of the sometimes unique local knowledge which these groups possess, the Council will, where appropriate, recommend applicants to discuss their proposals with local resident, community or amenity groups, in advance of submitting an application. In the case of major developments, a refusal to do so, if the result is material objections to the scheme, may be a consideration in deciding whether to grant permission.”

Sustainable Design and Construction: 6.1.7-9

Despite its focus on sustainability, reduction of carbon emissions, etc., this section has a major omission in that it makes no mention of the desirability of retaining the embodied energy contained in existing buildings, and hence of reuse, as an alternative to demolition, and creation of landfill and a demand for the manufacture of new building materials. It is therefore unsound in failing to address the issue of reuse of existing structures. We propose a fourth section, after 6.1.9:

“Demolition creates landfill, the increased carbon footprint resulting from a demand for the manufacture of new building materials, and the waste of the embodied energy contained in existing structures. Historic buildings built of traditional materials are particularly valuable in this respect. While many applications for demolition may be justifiable or sustainable, such applications will be expected to demonstrate that the long-term sustainability of the proposals outweigh the disadvantages of demolition. In the case of heritage assets and Conservation Areas, they will also be expected to demonstrate that they will conserve or enhance the character of the area.”

Landscaping and Public Realm:

6.1.13: Agree, but add “which respect or enhance the scale and character or their setting.” 1495

6.1.14: Agree, but this should normally be applicable only to new build, unless it can be incorporated into existing structures, particularly heritage assets, without damage to the structure or character of the building. 496

Tall Buildings

See our comments under the last two paragraphs of 6.1.2 above.

6.2 SP 12 – CONSERVATION

Highlighted SP12 Panel, p.142

While we support all the aims in this section, we suggest that, in the third bullet point, since Statutorily Listed buildings are not otherwise mentioned, and the official designation is Locally Listed Buildings of Merit (with capital letters), we are concerned that, as worded, this could create an undesirable ambiguity in the policy, suggesting that the promotion of the conservation of Statutorily Listed buildings may not be an aim; we therefore suggest that the point is reworded as:

“Promote the conservation of Statutorily Listed Buildings and Locally Listed Buildings of Merit”.

6.2.1. It would be helpful in this section to state what percentage of the borough is covered by Conservation Area designation.

6.2.5. Some recently-permitted new building in the Highgate Conservation Area has probably been of high quality design, but not at all sensitive to its setting. As worded, therefore, the final sentence could allow applicants to justify their proposals in design terms, whether or not appropriate for the setting. We are also unclear about the strength of the phrase “will seek to ensure”. It should be re-worded: “As such, the Council will require future development to be of the highest possible quality of design and to be sensitive and appropriate to its setting as well as meeting the Council’s green agenda.”

Highgate: 6.2.8-11. While adequate in itself, this section omits a vital aspect of the status of the Highgate Conservation Area, which is that the boundary between Haringey and Camden runs down the middle of

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Highgate High Street. The responsibility for management of the Conservation Area, and for ensuring appropriate treatment of an important Conservation Area, is therefore split between two local authorities who neither liaise nor co-ordinate their policies; at present, for example, a Conservation Area Appraisal exists for the Camden half of the village, but not for the Haringey half. This works to be serious disadvantage of coherent planning and conservation area management within Highgate.

We therefore request that a further clause be inserted in this section, after 6.2.11:

"Although the Highgate Village Conservation Area is a historical and architectural entity, responsibility for it is divided between the Boroughs of Camden and Haringey, the boundary between which runs down the middle of Highgate High Street. The Council will liaise with the Borough of Camden to ensure the greatest possible consistency in planning decisions and policies adopted by both Boroughs for the Highgate area."

6.2.18: Policy delivery indicators

A practicing architect on our Committee points out that the requirement for achieving Lifetime Homes standards and 10% wheelchair accessibility in "all homes" (this is presumably an error, as "all homes" cannot achieve "10% wheelchair accessibility"?) is extremely difficult, and sometimes impossible, to achieve in existing buildings, and particularly in historic buildings, and certainly within the next fifteen years. This first bullet point should be substantially modified or omitted.

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6.3 – SP13 Open Space and Biodiversity

A major failing of this section is that it appears to be silent on the ecological value of the significant area of gardens in the Borough; the western part of the Borough in particular has many large gardens, often adjoining or close to large designated public open spaces. Gardens form an integral element of the ecological chain linking the designated open spaces and nature reserves. This value is further recognised by recent Government action to prevent gardens being developed as "brownfield land." Their amenity value is further emphasised by Fig. 6.4 showing Open Space Deficiency in the Borough, and by other stated agendas for open space for amenity, health, leisure and play areas, all of which functions are filled by gardens.

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We therefore:

(1) suggest that the preamble of the second section of panel SP 13, p.149, states "All development shall protect and improve sites of biodiversity and nature conservation, *including private gardens*, through its:"

(2) ask that a further section, titled "Gardens", should follow 6.3.18, and suggest the following wording:

"Gardens

6.3.18a. There are many privately-owned gardens in Haringey, and in some areas they can be large. Many of them adjoin, or are close to, areas of ecological value and, as such, form an important element of the "green chain" essential for promoting biodiversity. Many gardens in the western part of the Borough were built in ancient woodland or incorporated former hedgerows, and still contain large numbers of veteran oak trees of major ecological importance. Gardens also have a valuable role in promoting Haringey's agenda for ensuring an adequate supply of land for amenity, leisure, health and play areas. Although not accessible to the wider public, their availability for a significant proportion of the Borough's population could help to reduce pressure on public open space, particularly in areas of Open Space Deficiency as delineated in Fig. 6.4. Their value is further emphasised by Government initiatives aimed at discouraging the development of garden land.

6.3.18b. All developments in private gardens will be required to state what measures will be taken to prevent damage to, and enhance the biodiversity of, the affected site and, where such damage cannot be avoided and is considered acceptable by Haringey, to make proposals for remedial or compensatory works, such as tree planting elsewhere, in order to avoid the progressive reduction in the biodiversity base of the Borough by a series of individual actions over time which may in themselves be relatively minor, but which cumulatively will have a significant impact on Haringey's ecology and biodiversity. For example, if it is necessary to cut down a 100-year-old tree to facilitate development, the applicant will be expected to replace it, either on site or elsewhere in the Borough, with, e.g., ten 10-year-old trees of the same species.

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