

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

submission by Christopher J Mason.

Role: Chairman – Joint Conservation Areas Advisory Committee

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, particularly in respect of Conservation Area boundaries.

### **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. Detailed examination of conservation area boundaries in some areas show poor assessment and bad practice.

### **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 after appraising boundaries in accordance with NPPF principles and English Heritage guidance.

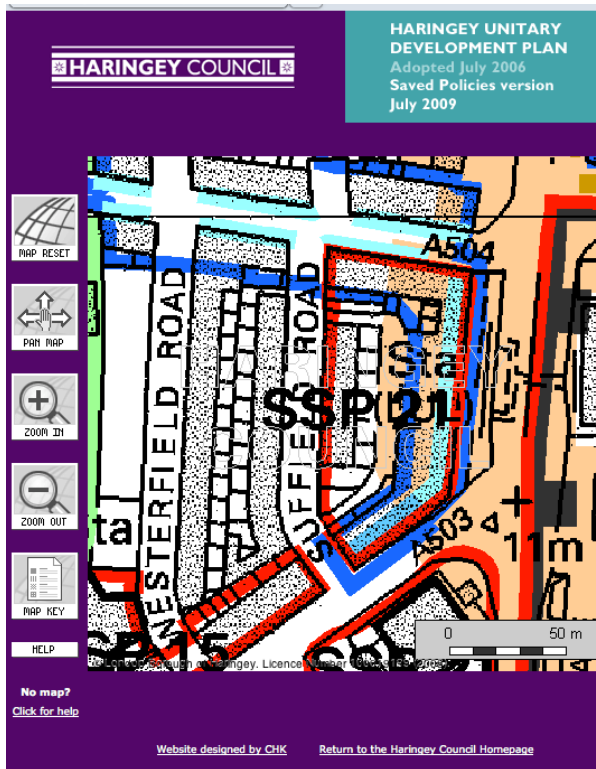
### **What is the precise change/wording that is being sought?**

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 in principle 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. I take, for example, two examples. The first is a section of the Borough at Seven Sisters. The buff notation for a conservation area is covering half of a contentious site indicating it is of architectural or historic interest, yet the red line indicates a comprehensive redevelopment proposal that will raze the site to the ground, half of it being a Heritage Asset. I will also take by way of a second illustration a section of the Crouch End Conservation area on the other side of the Borough to demonstrate the matter is not localized to one occasion or location, thus the whole matter needs examination and checking.
6. The Cartoplus map shows, at the Wards Corner site, two contrary notations affecting the same land. Thus the Local Plan does not give certainty and a positive steer to development, instead it creates confusion.



7. This raises the matter of whether the Planning Department at Haringey is resourced well enough and doing the tasks required to properly carry out its duties.

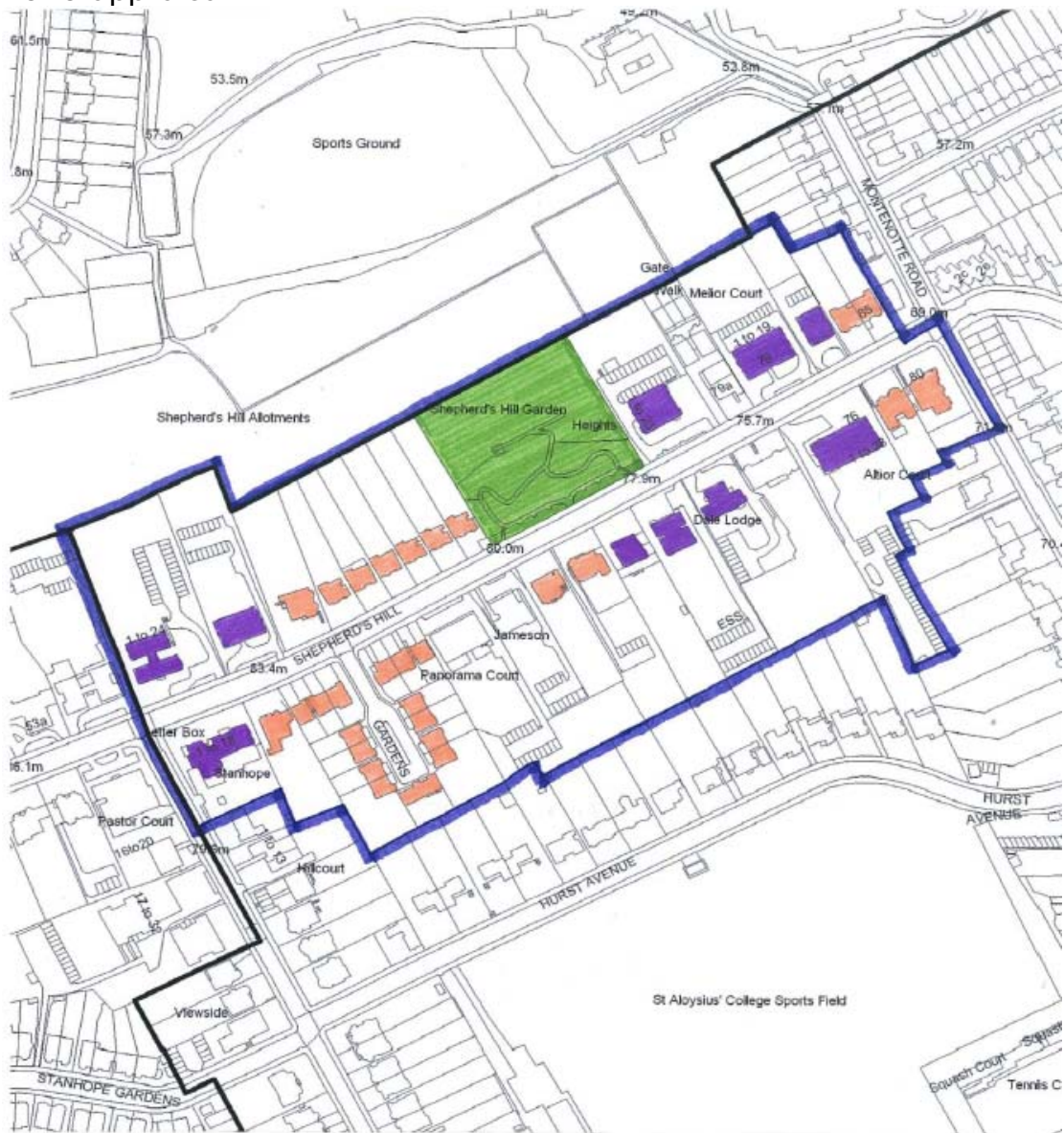
8. The NPPF in paragraph 127. states: *'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'* It is arguable.
9. There is an assumption that when the original designations were made that the terrace on the south east and eastern side of the block, which included a large retail provision (Ward's) was considered to be part of the historic Tottenham High Road Corridor and thus warranted retention and was thus designated as a Conservation Area.
10. It seems perverse that there was a development brief advocating the demolition of this street block including the designated asset, but that appears to have slipped through in the past.
11. The proposal has caused considerable community concern and the Coalition of organizations has contacted me to look at the situation.
12. As a member of the Haringey Design Panel I had hoped to comment on the case, but it was arranged at 24 hours notice to be on a panel while I was out of the country. The others on the Panel also had issues with the proposal, but to my knowledge the conflict of the contrary indications of the Local Plan were not discussed. I am therefore making a separate comment on the current application which is being processed despite an appeal on an earlier proposal being scheduled for Inquiry in October.
13. Taking the National and regional framework and policy, the Haringey plan with its old notation of SSP21 dating from a brief in 2004 is the oldest, although it still is in the emerging plan. More recent is the London Plan, and of particular relevance is Chapter 7 and 7.8 C & D. Of new and therefore most significance is the NPPF and in particular Paragraph 17 which requires *'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations'*; 127 (quoted above) ,137 which says *"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably"*.
14. It would appear that paragraph 141 has been heeded as that says: *"Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact,*

*and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."*

In this respect there is an appraisal of the area which notes two buildings in the site as being locally listed and three more and contributing. This relatively recent appraisal made no recommendations to change boundaries (usual practice recently in Haringey) The description of the terrace in the appraisal notes poor shopfronts (presumably tolerated or permitted in the last 47 years by Haringey) and their run-down appearance but it does not conclude that they should be demolished and thus the presumption of the London Plan and NPPF should prevail and a heritage led regeneration undertaken here. The specialist report appears to be biased in favour of the redevelopment and is therefore suspect.

15. To avoid the conflict of two designations conflicting the proper course of events would be to take the controversial line, if there is intention to redevelop and make the argument through the Local Plan process that the designation was not worthy and amend the boundary of the conservation area to exclude the site, OR to scrap the present scheme that appears to be very ordinary and bland and undertake a conservation based scheme to reinforce the Georgian Victorian ands Edwardian character of the corridor and reinforce that.

16. To illustrate the Crouch End example, I reproduce a section of the 2010 appraisal.



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**Sub Area Boundary and Heritage Assets Appraisal**



17. In this case I believe the appraiser has been overgenerous with the orange notation in respect of the residences west of the green space. They are speculative inter war houses that are not related to the Crouch End character at all. Thus most of this sub section is either neutral or detracts, thus to be in line with the NBPPF expectations it should be de-designated or the boundaries drawn tightly around the assets that do contribute. This the Authority has failed to be rigorous in this respect and rigor is expected by the NPPF.

18. 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, particularly with conservation and amenity bodies to urgently review Conservation Area boundaries and consultation on it (para 151) and Statement of Community Involvement; and
  - Require the designations to be reviewed as part of the Local Plan process to be sensible and consistent and relevant as required by Para 127,