

Haringey Core Strategy – examination in public

Further written information by Chris Mason.

Date 1st June 2011.

Introduction

1. These are combined comments as I submitted observations in two roles, firstly as Secretary of Friends of the Parkland Walk (representation reference 17), secondly as chairman of the Joint Conservation Areas Advisory Committee (representation reference 31) and relate to general matters, large changes that are needed as well as comments on the minor changes. It is therefore timed to fit with the deadline for the earliest of these.
2. I will concentrate my comments on the two sections of the strategy on which I made detailed comments in respect of the above roles. In both cases the responses to my observations raise questions of soundness. I note from the programme that soundness is being dealt with early in the examination schedule and not on the days allocated to my topics (5th July). However, as they are pertinent to my topics (and as agreed in the presence of the Programme Officer at a meeting with the Inspectorate's representative on 31st May) it is necessary and appropriate to communicate the concerns before the Examination. I will set out my thoughts on soundness in an introductory section, below:

1. Soundness issues

3. The Core Strategy is designed to replace the strategic part of the UDP and needs to set out where change is expected, the physical extent of that areas subject to planned change and how it will be delivered. It needs to be formulated from a sound evidence base, input from the community (through the mechanisms set out in the Statement of Community Involvement) and finally it needs to give certainty over where change will and will not occur and therefore remove uncertainty (excluding 'windfall' activity).
4. On several counts the process seems to have failed or be failing and thus the soundness of the Strategy comes into question. I, professionally, come from a culture where consultation is expected to be meaningful, the input from consultation is respected and intended to be helpful and thus improve the document or process concerned. Generally, in this culture, helpful comments are absorbed into the revised documentation and it is usually improved as a result. Only when consultation responses go directly against the organisation's aims and objectives is the observation rejected with sound reasons. On examination of the responses to Haringey, all the points I made resulted in just one word (heritage) being

added as a minor change. All the rest were rejected in a “mother knows best” approach to comments. I not only find it offensive that an organisation can be so arrogant that it regards everything it’s done is so correct and it cannot be improved, but fellow consultees have also shared this experience and find that most responses have been rejected.

5. This seems to be entirely contrary to the expectations and spirit of the Statement of Community Involvement. Furthermore there has been very little outreach by the planners at Haringey to organisations such as those I represent. Whilst the Core Strategy did go through an earlier phase of consultation in 2009, all those comments were viewable online. All comments to the present phase were not visible online and it has been extremely difficult to see the full range comments made as the consultation portal retained only the 2009 results in the 2010 ones were not visible. This smacks of undue secrecy and lack of transparency, again a practice that surely must be contrary to the expected spirit of any adopted Statement of Community Involvement. It was only 2 days before the closure of comments that the Programme Officer e mailed Proposal Maplets and the full schedule of comments despite requests going back to last Christmas and PM changes being in list form. It is understood the Cabinet Reports were considered without a schedule of responses to the Strategy and the Council’s proposed responses, which is standard practice in most authorities.
6. When the Federation of Residents Associations organised a day to go through the Core Strategy, the attendance of officers was promised and then withdrawn. It did coincide with period in the run-up to elections, however on a technical matter such as this there was nothing political to be discussed and the excuse of withdrawing officer support because of Purdah before the elections was, in my view, spurious, unhelpful and designed to reduce debate and involvement.
7. In retrospect, comments on the Core strategy were rushed, for the reasons set out in paragraph 8, below and on reflection the Core Strategy includes detailed policies that are more suited to Development Management Policies and the document could be much slimmer and just concentrate on matters of strategic change.
8. The consultation on the Core Strategy was bundled together in May and June 2010 with a parallel consultation on a booklet of Site Proposals for redevelopment and a draft Development Management Plan (DMP) to replace part 2 of the UDP. This was produced despite policies being saved for ongoing use which would allow the Core Strategy to be settled first and the more detailed policies to

naturally follow on from the finalised Core Strategy, as it heads towards adoption, assuming it is sound enough to be adopted.

9. The DMP and the Sites document were very poorly put together. Whilst some consider it useful to have the equivalent of a whole replacement UDP at once in these three documents it did not work well. The site plans were poorly researched and in cases I know of locally they were either not available for redevelopment or even had been redeveloped already. One ordnance survey extract showed a recent housing development within the red line of the 'garage' site noted for redevelopment for housing. Clearly no one had been out to inspect the site but it was in the booklet of plans– this suggests lack of checking and poor process control in the planning department.
10. The DMP was hastily thrown together (evidence base unknown) and when references in the Cabinet draft are compared to the final publication, the number of policies was clearly reduced significantly at the last minute. When printed, it contained a mixture of rolled forward UDP type policies as well (in the pollution section) as guidance on how to avoid glare in car parks. It was, therefore, a muddled mix of old policy and guidance (that should be SPD or just a design guide) put together in what appears to be a very hurried production.
11. By combining the three consultations at the same time, attention was diverted from the Core Strategy and effort was necessarily diverted from the Core Strategy so some attention could be given to the other two documents. No document, therefore, could be afforded the attention that each needed. At a meeting after the election, that was grudgingly convened in place of the Saturday seminar set up by the community, we complained to the staff concerned that it was "cruelty to consultees" to overload us with three major documents at the same time. There was a feeling in the community that it was done deliberately order to minimise the attention paid to the Core Strategy, or any of the documents.
12. One charity approached me in my conservation role as it occupies a former secondary school for training underprivileged people. Their trustees had no outreach to them and were not even consulted or asked about what their needs were and were excluded from the site plans. There was no mention of possibly relocating them as a strategic aim in the Core Strategy either, a move that they may have welcomed as it could have put their facilities in a better location, made them ore efficient and released the present site for other purposes to fund the move. I was concerned at this lack of engagement of a major charity in the Borough.

13. As background, I must mention that I was involved in a focus group some years ago about how Haringey performs. It was a facilitated meeting where comments were written on post-it notes and then grouped. The largest number of comments was about planning consultation and the view reached at the end of the session was that Haringey were notorious for undertaking a consultation, taking in the results, doing nothing with them and then proceeding to do what they were going to do anyway.
14. This practice seems to be continuing as evidenced by the above performance. This would suggest that lip-service is being paid to the Statement of Community Involvement, but that it is not actually being used as intended or the effort made to collect evidence from community groups, therefore a serious question of soundness arises. I can testify that my groups were never invited to meetings or fact gathering sessions.
15. In a number of the comments to my submissions, DMP policies are referred to as the policy dealing with the issue (DMP 21 in respect of rep 31/2/5.3, 31/5/6.1, 31/13/6.1 & 31/14/6.1; DMP 9 in respect of 31/10/6.1 and DMP 13 in respect of 31/12/6.1). As noted above the Development Management Policies were rushed out, to my knowledge not based on evidence or research with community groups consultative committees or the like, and I would invite the inspector to enquire on what evidence base the Development Management Policies, which are now being relied upon, were based, their status (which should be very light as a material consideration as they were in an unrefined first draft). They have not received any further attention, to the knowledge of consultees, as resources have concentrated on the Core Strategy. This means reliance is now being put on draft policies that have been out consultation once and worked on no further. I regard this practice as also unsound. Another authority with which I am familiar, held evening seminars that were recorded and transcribed as the base evidence for producing its options for a city management plan, these were then consulted on and are in the process of being refined into replacement policies for the UDP. It was therefore well evidenced, recorded and analysed, put through an option stage and consulted on before drafting the detailed management policies (the equivalent of the DMP). This seems to be a sound approach and the corners cut by Haringey, by comparison, seems to be totally unsound. To then begin to reply on policies, which have been formulated in an unsound way, is further unsoundness.
16. The Core Strategy needs to be more than a Unitary Development Plan rolled forward, because it should accommodate the site

requirements and investment strategies of other public bodies such as health, police, and other infrastructure needs which will require a land allocation, particularly in the first five years of the 15 year span.

17. This piece of work appears to be little more than a UDP rolled forward and this is supported by the fact that there is no new Proposals Map. It would appear that the council is cutting corners by not producing a draft of a new Proposals Map and intends to make small alterations to the existing UDP proposals map and publish one after receiving the Inspector's Report. This is, In a complex area like London an unsound practice. The requirement of the Core Strategy to guide all public investment, and to go wider than the former constraints for a land use plan which only dealt with land-use issues and physical 'development' issues. A Proposals Map for a Core Strategy should be a very different map to a UDP Proposals Map. It therefore seems basically flawed, therefore unsound, to roll a UDP map forward with a few tweaks unseen and slipped out after the Report, which is binding under present legislation. Whilst some aspects might be diagrammatic, some items in London such as the boundaries of Green Belt, nature conservation constraints, and the exact boundaries of Metropolitan Open Land should be recorded, exposed to scrutiny by the public and examined. If not the UDP boundary will be rolled forward and as stated in the third section, below there were problems in the past that have never been challenged and need to be corrected.
18. Stepping back, it therefore seems that the whole process is unsound if it is just a rolling forward of the UDP (part one) and not dealing with the needs of other bodies or wider management issues for the Borough outside the former physical planning sphere. As a Spatial Plan it needs to be more inclusive of other disciplines and functions.
19. When this is coupled with the scant regard to the process is expected in the Statement of Community Involvement and the lack of any engagement and even forbidding staff to attend one meeting set up by the community on a Saturday to assist with formulating worthwhile responses because of the Purdah fiasco, the whole process becomes questionable. It is therefore arguable that the Examination should be deferred for these matters to be put right.
20. Turning now to the specific areas on which I commented, I looked in particular and to Design, Conservation and Town Centres in my role as chairman of the Joint Conservation Areas Advisory Committee and to detailed boundary issues in respect of the area of former railway land that is known as the 'Parkland Walk', of which I

am Secretary of the Friends group. These are dealt with in that order below:

2. Design, conservation and town centres

21. Under policy SP 10, I commented that there was little vision for how Tottenham Hale could develop. I base this view on a consultation that was recently undertaken and the only cogent output was 'keep the park'. The retail sheds at Tottenham Hale (and those out of the borough on the North Circular Road) have seriously damaged the viability of shopping along the former main road Cambridge, which is a string of conservation areas including mainly Georgian and some late Victorian and Edwardian replacement buildings that run from the north to the south of the borough. Another badly planned retail park on the site of the former Haringay Stadium, by Haringgy Green Lanes station, is also sucking the lifeblood out of traditional shopping streets. Wood Green Shopping City on a swathe of former railway land is also not a visual or environmental delight, being a 1960s / 70s megastructure that is not people friendly, but may gain the Haringey Heartlands as an adjunct to the west of it.
22. The final paragraph of SP 10 is simply unacceptable in a core strategy, it is either a major area for change or there is anticipated to be little change. Announcements on budget day that Haringey has been negotiating for an Enterprise Zone, together with the uncertainty over the White Hart Lane football stadium, throws the whole regeneration strategy and the potential future pattern of retail use into disarray. Whether Tottenham Hale is to be a district centre or not should be part of this consideration. My representation was trying to convey that the issue of heritage led regeneration in the historic core of the old main road WITH what could happen at Tottenham Hale is intertwined. It may mean taking shopping out of Tottenham Hale in order to bolster the viability of the linear and historic shopping area. This is too fundamental to be left to an area action plan as the economics of the equation are essential to delivering whatever change is felt to be desirable.
23. I commented about the current economic circumstances. This not only about recession but also about the changing patterns of purchasing which is having a significant effect on some shopping areas as increasingly shopping is done online with the purchases delivered by mail or couriers. Shopping therefore becomes a more social activity with comparisons made, entertainment and possibly eating and refreshments not a trip in the car to a single destination retail shed. I question whether the research is now out-of-date in the rapidly changing circumstances of internet shopping.

24. The response to my comment reference 31/15/6.2 notes that the matter will be dealt with through an area action plan. Whilst the detail of development mix and site use might be the subject of a more localised plan, the fact that it is identified in the London Plan as an area of intensification, the Core Strategy and its Proposals Map should identify the area affected by change, if nothing else to give certainty to the people around it that are not affected by proposed change. The matter of an Enterprise Zone when planning controls may be relaxed, and could include this area, adds further to the uncertainty. This, therefore is another reason why a pause is needed to allow the council to consider the combined effects of enterprise, intensification and present economic circumstances.
25. One of the key issues for a Core Strategy is to set out how change will occur and how it will be delivered. Given the need for possibly less retail space, as more shopping goes online, the need to reinforce historic centres with a well-placed redevelopments to make it compete with purpose-built shopping centres (such as that opening at Stratford at present) an indication of the land uses and heights and floor plates that would bring about the intensification and what might be expected within it, is surely a Core Strategy issue and not something to be left to an Area Action Plan. For these reasons it is considered that the whole approach to retail, redevelopment and intensification in the eastern part of the borough is seriously flawed.
26. The writer is of the view that the evidence needs to be revisited to see if it is still valid and the extent of any potential Enterprise Zone be defined. The effects on other centres predicted if a simplified regime allows development of types likely to have a knock-on effect to existing centres and particularly those with concentrations of heritage asserts. The result of further study should be a definite view on the status of Tottenham Hale and policy principles for redevelopment there.

3. Observations in respect of open space and biodiversity.

27. My principal concern is that in respect of 17/1/6.3 the crucial point has been sidestepped and not dealt with.

I noted that the boundaries of Metropolitan Open Land (MOL) were first designated in the 1982 Plan. To our fairly certain knowledge, the only discussion of this topic has been over the notation on Proposals Map in a subsequent revision of the plan. The Friends group was dormant at the time of that UDP revision, and we did not participate. We have, however, now compared the Proposals Map from 1982 (which appears to have been produced by traditional

optical means) and subsequent maps which appear to have been produced from a digital base.

28. Many small changes, some adding to Metropolitan Open Land and some removing designated land are a sensible tidying up, putting boundaries where they should have been on the correct fence lines, which were generally those of the former railway land as purchased from British Rail. We have, however, by e mail of 14th December 2010 to our chairman David Warren received the following view:

From: Whelehan Ciara

Sent: Tuesday, December 14, 2010 4:08 PM

To: 'David Warren'

Subject: RE: Parkland Walk - Metropolitan Open Land

Hi David,

Thank you for your email and apologies for the delay in responding.

To answer you questions:

- 1. Parkland Walk is formally designated as Metropolitan Open Land. It is also designated an Ecological Valuable Site, of Metropolitan Importance.*
- 2. Parkland Walk was designated MOL in the 1982 Haringey District Plan, recommended by the Planning Inspector in his report dated October 1980.*
- 3. This formal designation does include specific boundaries and the Inspector's Report into the Public Inquiry in 1980 states that the boundary is shown on the Proposals Map of the District Plan.*
- 4. The two main adopted policies which protect the Parkland Walk are OS2 Metropolitan Open Land and OS6 Ecologically Valuable Sites and their Corridors. Any changes to the boundary of MOL would have to be done through the plan making process and would be subject to formal consultation, an Examination in Public and then subsequently approved in the Core Strategy.*
- 5. As far as we can tell from the information available in the District Plan 1982 and the existing UDP 2006, no significant changes have been made to the boundary of the Parkland Walk since 1982.*
- 6. There are no proposals to make any changes to the MOL boundary in the emerging Core Strategy.*
- 7. The Proposals Map from the UDP (2006) does show the MOL boundary for Parkland Walk, it is not indicative.*

I trust the above answers your queries.

Regards,

Ciara

Ciara Whelehan
Team Leader Planning Policy

29. Other changes indicate the deviousness on behalf of the authority, a matter confirmed to our chairman by the Head of Development Management, who admitted that the boundary was changed in a few places around the sites council wanted to sell off or dispose by lease to others. These sites are:
- The former garden centre at Cranley Gardens N10;
 - The former Station House at Stapleton Hall Road N4;
 - The former railway cottage at 3 Francis Place N6.
30. It would also appear that the whole area of the “bowl” at Highgate Station was added after the first definition, and other areas elsewhere in the Borough have not been checked as they are not the immediate interests of the Friends, but it is felt a warning should be conveyed to the inspector that boundaries could be and have been moved. Others have called for Priory Park to become MOL, so the whole stock of Green Belt and MOL needs attention at the LDF Core Strategy stage.
31. In respect of the Parkland Walk, alterations in the boundary have been made so areas have been designated or de-designated as metropolitan open land by stealth if one accepts all the presently mapped boundaries on the last UDP Proposals Map without question. This is not in accordance with the London Plan as it now stands and seems an inappropriate practice in the past. The Friends have received differing opinions from different officers over recent years. Some regard the Friends view as correct (in that the boundary is defined where it was **first** defined unless it has been amended **through debate in the plan making process**). Others, more worryingly, regard it as where it is on the current UDP Proposals Map. The Friends regard deletions as errors of drafting (as are additions) but, given the Friends role in supporting open space, nature reserves diversity and Metropolitan Open Land, we would not object to increases in the area. The Friends therefore feel that this present plan making round should be the process where the alterations to Green Belt and MOL boundaries since their original designations are checked, and put back where they were first designated unless previously debated and agreed or changed as part of the present process.
32. The Friends have produced detailed maps showing the additions and deletions since 1982 in subsequent editions of the Proposals Map which can be produced at the examination on 5th July when this topic is programmed or submitted by that time if an appearance is not necessary as a result of this submission.
33. The writer once produced a Proposals Map for a Local Plan and it was the first digitisation process and also followed presently

mapped fence lines. One fence line included an area of former green belt that had been enclosed as residential garden. This was challenged by the local amenity society and precipitated a second enquiry. The view held there was that the green belt boundary was as originally designated and that the additional garden area was still green belt and the boundary change was regarded as an error. Having undertaken this task myself and made a similar error, the writer is now particularly vigilant as he knows how easily it is done. If there is a secondary agenda to assist land transactions as well, as there seems to be at Haringey, then a particularly hawkish approach must be taken by groups acting as critical friends.

34. The Friends are therefore particularly concerned about changes that might yet happen on a Proposals Map that has not been seen and vetted. The cause for this concern is the fact that Haringey, probably improperly, embarked on a programme of selling garden extensions to adjacent households without the de-designating the land as Metropolitan Open Land or changing the land use from public open space to residential garden. It did impose covenants to prevent the building of sheds etc. but there are now a number of these plots for which the Council is no longer receiving rent (although some were sold freehold). This is a very unsatisfactory situation that has resulted in a further erosion of Metropolitan Open Land without debate or due process. Our prime concern is that the boundary of Metropolitan Open Land could be "conveniently moved" to the present fence lines when the proposals map is finally drawn, despite the claim that no change is proposed.
35. Thus the Friends are particularly concerned that the various changes over the years have never been debated, but should be debated now to be in conformity with Chapter 7 of the Replacement London Plan. The lack of Proposals Map gives the Friends no chance to check that surreptitious changes will not be made and these garden areas taken out of MOL without discussion or debate. We simply do not trust the council as they have already proved three times that they are prepared to move the boundary in order to facilitate a sale.
36. As part of the core strategy process, amendments have been proposed to the 2006 UDP Proposals Map. A borough wide map showing these amendments has not been produced, instead, extracts highlighting the relevant changes were produced and these have been submitted to the planning inspector alongside the Core Strategy. These Proposal Map amendments should be incorporated into a new borough wide Proposals Map and subjected to community scrutiny before the inspector closes the Examination –

with a deferral to allow it to happen and all relevant parties consulted on the draft.

37. The council response is that the representation is factually incorrect, but the evidence above suggests that the council is trying to cover sales that it made in the stance agreed by Cabinet on 22nd April 2008 of re-leasing land (which the Friends dispute as improper) and that this matter should be examined and debated in the forum expected by Chapter 7 of the Replacement London Plan. The Friends therefore contend that to proceed without a draft Proposals Map to establish the boundary between Metropolitan Open Land and ordinary urban land is unsound.
38. If necessary as evidence, the Friends can produce sets of eight drawings detailing the changes to MOL boundaries to its area of interest over the last 30 years to demonstrate that it is not acceptable to simply roll forward the old UDP mapping, as it contains un-debated changes. Also it can map the areas it now regards as under threat to possible, further surreptitious mapping changes.
39. The writer is of the view that the Authority should be required to pause and produce a PM and consult on it before the Examination is closed at a deferred date. An alternative, if the unusual exception can be allowed as sound procedure, is to have a diagrammatic PM showing the areas of significant change and require that a fully developed map on OS Landline data be produced with a revised draft of the DMP (with any policies found to be too detailed in the CS incorporated in it) and subjected to a new round of community engagement with stakeholders before that is Examined.