

Schedule of Minor Changes - English Heritage's Responses  
7th June 2011

Section Title	Page No/para No	Policy or Box Title	Proposed Change	Reason for Change	Ref number	English Heritage Response
I.4 Challenges facing Haringey	44/1.4.26	High quality design	Insert new paragraph after 1.4.26 to read: "The Council will use its available powers to ensure the English Heritage 'Heritage at Risk' register contains a minimal number of Haringey properties or conservation areas".	Clarification of wording recommended by English Heritage.	15/5/1.4	Support changes proposed, subject to changes in wording so that it reflects the proactive intentions of the Borough in conserving its heritage assets, in line with PPS5. The following changes are proposed:  The Council will <u>actively</u> use its available powers to ensure the <u>Haringey's section of the English Heritage 'Heritage at Risk' register is reduced, with the ultimate aim of having no-contains a minimal number of heritage assets such as listed buildings Haringey properties or conservation areas on the register.</u>
I.5 Vision and Objectives	47	Vision Statement for Haringey in 2026	Amend the fourth sentence of the vision statement to read: "Across the borough, neighbourhoods have benefited from preserving their historic character and improving areas where required, such as estate regeneration".	Clarification of wording recommended by English Heritage.	15/6/1.5.2	Support changes proposed.
I.5 Vision and Objectives	49/1.5.5	Key principles	In 7th bullet after "environment" add "'s contribution to an area's	Clarification of wording recommended	15/7/1.5	Support changes proposed.

			sense of place".	by English Heritage.		
1.5 Vision and Objectives	50/1.5.6	Safer for all	Amend fourth bullet point to read: "To conserve the historic significance of Haringey's heritage assets and historic environment".	Clarification of wording recommended by English Heritage and to reflect PPS5.	15/8/1.5.6	Support changes proposed.
2.1 Haringey's Spatial Strategy	54/2.1.4		At the beginning of paragraph 2.1.4 insert the following: "Development in the growth areas should take account of the community, environmental and other distinctive local characteristics of each area, deliver good design, including public realm, open space and promote social and economic inclusion and relate development to the surrounding areas. Tall buildings may be appropriate at certain locations within these areas (see SPI I Design for the Council's approach to tall buildings), subject to further detailed analysis.	For clarity, in line with comments received from English Heritage.	15/9/2.1	Please see our comments to the Draft Statement of Common Ground (dated 31 <sup>st</sup> May 2011), where we state that we support the inclusion of this paragraph as part of the scene setting for policy SPI I. However the identification of these areas as being potentially suitable for tall buildings needs to be fully justified with robust evidence. At present no evidence has been provided which supports this policy direction or assess the appropriateness of tall buildings any part of the Borough. This is contrary to PPS1, PPS12, PPS5 and the EH/CABE Guidance on Tall Buildings (2007).
3.1 SP I Managing	61	The Council's	The third bullet of the aspirations for Haringey	For clarity and in line with	15/11/3.1	Support changes proposed.

Growth		Aspirations for Haringey Heartlands:	Heartlands should be expanded to read: "Physical and visual integration of the Heartlands with the wider area to benefit..."	comments received from English Heritage.		
3.1 SP I Managing Growth	75/3.1.42		Paragraph should be amended to read: "The Council will ensure that development in the areas of limited change respects the historic significance and character of its surroundings..."	For consistency with PPS5 and in line with comments received from English Heritage.	15/14/3.1	Support changes proposed.
4.1 SP4 Working towards a Low Carbon Haringey	92/4.1.7		Insert new paragraph after 4.1.7 to read: "Haringey has extensive conservation areas and significant historic heritage. When considering decentralised energy options, whether they are micro-generation or larger schemes, consideration will be given to minimising physical impacts on the historic fabric of buildings and ensuring reversibility wherever practicable. Poorly designed measures could seriously detract from the historic character and fabric of buildings and landscapes, whereas well-designed	Point of clarity and improved referencing to PPS5. To address comments received from English Heritage.	15/15/4.1	Support changes proposed.

			measures sensitive to the historic context can contribute to the borough's targets for reducing CO2 emissions".			
4.1 SP4 Working towards a Low Carbon Haringey	97/4.1.23	Existing housing stock	At end of paragraph insert new sentence: 'Retrofitting measures must have due regard for historic significance, as set out in objective HE1.3 of PPS5'	Improved referencing and in line with comments received from English Heritage.	15/18/4.1	Support changes proposed.
4.3 SP6 Waste and Recycling	104	Key evidence and references	Add "Planning Policy Statement 5" in the list of references to provide evidence for the climate change policy as it relates to the historic environment".	Improved referencing and in line with comments received from English Heritage.	15/19/4.1	Support changes proposed, subject to the inclusion of the English Heritage web site <a href="http://www.climatechangeandyourhome.org.uk/live/">http://www.climatechangeandyourhome.org.uk/live/</a>
4.4 SP7 Transport	106	SP7	In the second part of SP7, under the heading Delivering Action on Climate Change and Quality and Healthy Places, add after "local place shaping" "and public realm".	To address comments received from English Heritage.		Support changes proposed.
5.1 SP8 Employment	117/5.1.2 1		Insert new sentence at end of paragraph to read: "In addition, environmental enhancement and high quality design are an important	Improvement to referencing and signposting and in line	15/21/5.1	Support changes proposed, subject to the inclusion of a cross reference to SP12.

			element in the enhancement of existing employment sites. Please see SPI 1 for the Council's approach to design"	with comments received from English Heritage. (See Appendix 2 for further changes to SP8)		
5.3 SP10 Town Centres	128/5.3 .1 2	Protecting and promoting the town centres	Last sentence should read: 'Further information on town centres and the Council's approach to enhancing and protecting them are set out in SPI 1 and SPI2, and the Council's conservation area appraisals and Haringey's Development Management Policies.'	Improved referencing and signposting and in line with comment received from English Heritage.	15/23/5.3	Support changes proposed.
5.3 SP10 Town Centres	125/5.3 .1 2	Protecting and promoting the town centres	Insert new sentence at the end of the paragraph to read: 'This is also in line with continued investment in the public realm to maximise the historic environment's contribution to town centre vibrancy and vitality in policy, as set out in PPS4 and SPI2.'	For consistency and improved referencing and in line with comments received from English Heritage.	15/22/5.3	Support changes proposed.
5.3 SP10 Town Centres	130/5.3 .2 2		Insert new sentence at end of paragraph: 'Additionally, investment into the public	For consistency and in line	15/24/5.3	Support changes proposed.

			realm and historic environment will support the economic competitiveness of town centres by ensuring that their historic environments are maintained to maximise their attractiveness.	with comments received from English Heritage.		
5.3 SP10 Town Centres	136	Key evidence and references	Insert new references: Planning Policy Statement 1, Delivering Sustainable Development, Department of Communities and Local Government 2005; and Planning Policy 5, Planning for the Historic Environment, Department of Communities and Local Government 2010.	Improved referencing and signposting and in line with comment received from English Heritage.	15/25/5.3	Support changes proposed.
6.1 SP11 Design		SP11	After "character" Insert "and historic significance" into the first bullet point of SP11.	For clarity and in line with comments received from English Heritage.	15/26/6.1	Support changes proposed.
6.1 SP11 Design		SP11	In policy box SP11, second section on tall buildings, replace the text to read: "Applications for tall buildings will be assessed against the following criteria: <ul style="list-style-type: none"> <li>the potential contribution to</li> </ul>	To address comments raised by English Heritage. And AGRA	15/26/6.1 4/68/6.1	Please see our comments to the Draft Statement of Common Ground (dated 31 <sup>st</sup> May 2011).  In our response we stated that the proposed changes to the second part of SP11, do not provide a robust plan-led approach to tall buildings in the Borough appropriate to the Core Strategy.

			<p>placemaking &amp; legibility;</p> <ul style="list-style-type: none"> <li>• the highest quality design;</li> <li>• the appropriate relationship to both local and historic context;</li> <li>• the careful and comprehensive consideration of impact on ecology and microclimate;</li> <li>• appropriate infrastructure provision, including excellent public transport;</li> <li>• an adopted masterplan framework for the site and surrounding area; and</li> <li>• compliance with all the relevant recommendations as set out in CABE / English Heritage “Guidance on Tall Buildings”, 2007.</li> </ul>			<p>Please note that the version proposed here does not correspond with that set out in the Draft Statement of Common Ground – dated 31<sup>st</sup> May 2011. For example the criteria list includes references to adopted AAP/Masterplans and Characterisation Studies, as part of measuring the appropriateness of tall buildings. An approach we do not support in terms of non-compliance with PPS12, Replacement London Plan and EH/CABE Guidance on Tall Buildings (2007).</p> <p>We advised that the following words would help clarify the Borough’s approach to managing tall buildings at a strategic level:  <u>Tall buildings may be considered appropriate at selected sites in Haringey Heartlands/Wood Green and Tottenham Hale. Further guidance on appropriate sites will be identified through detailed analysis as part of the preparation of masterplans or AAPs. Elsewhere tall buildings are considered inappropriate to Haringey’s predominantly 2-3 storey residential suburban character.</u></p> <p>And that the criterion elements of part 2 of SPI 1 would be more appropriate in the Development Management document. Expanded further by using the headings set out in the EH/CABE Guidance on Tall Buildings (2007) criteria evaluation section 4.</p>
6.1 SPI 1 Design	6.1.15 - 6.1.22	Supporting text on Tall buildings	Insert new paragraphs to the supporting text on Tall Buildings to read:	To address comments raised by	15/28/6.1 26/51/6.1 1/5/6.1.7	Require further clarification before providing any indication of support or not.

		<p>"The Council has adopted the definition of Tall Buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, or are of 10 storeys and over. Tall buildings can contribute to townscape Placemaking and Legibility. They can help mark the location of Town Centres and major traffic nodes, close vistas of long straight roads and define landscape features. However, excessive height tall buildings can have intrusive effects on both the immediate and the wider area, by altering the established skyline, by adversely affecting attractive local views, heritage assets and their settings, buildings of townscape importance and important landmarks. The Highest Quality Design will be required for all Tall Buildings and design skill will be needed to fulfil their many different requirements. In the past tall buildings have been erected which have spoilt the</p>	<p>English Heritage, Haringey Federation of Residents Association and Alexandra Park and Palace CAAC and AGRA</p>	<p>4/68/6.1 26/49/6.1 26/48/6.1</p>	<p>First, the text provided is not complete and sometimes in coherent. We suspect that this has occurred during drafting and possible conversion into tabular and PDF form.</p> <p>Second, the text proposed as far as it can be understood appears to differ from that proposed in the Draft Statement of Common Ground – dated 31<sup>st</sup> May 2011.</p> <p>We would require further clarity on the full details of the text now being proposed.</p>
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			<p>established scale and character of the surrounding townscape. Their excessive heights, scale, form and design have an intrusive effect over a wide area. Likewise over bulky developments can have had an overbearing effect, resulting in canyon-like streets with poor standards of daylighting, amenity, and an uncomfortable microclimate.</p> <p><b>Relationship to Context</b> Haringey is characterised by predominantly low-rise (2-3 storey) residential suburban development across the borough and 3-4 storey development in its Town Centres. The exception is Woo.....</p> <p><b>Impact on Ecology and Microclimate</b> Tall Buildings can be appropriate as part of sustainable development, but must avoid negative impact on ecology and microclimate. The potential to create downdraft and funnelli</p> <p><b>Infrastructure Provision</b> Given the requirement for high quality sustainable</p>			
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			<p>development, tall buildings should not be to the detriment of the existing townscape and local public and social infrastructure. Wherever a ta.....</p> <p>Masterplan Framework The Council considers that the two areas, Haringey Heartlands/Wood Green and Tottenham Hale, are suitable for some tall buildings, because they are close to major transport interchanges a .....</p> <p>In all cases, the design of the tall building should comply with the recommendations contained in the CABE / English Heritage 'Guidance on Tall Buildings' (July 2007). It sets the criteria for the evaluating of proposals.....</p>			
6.2 SPI2 Conservation		SPI2	<p>Amend SPI2 to read as follows: "The Council will support proposals that conserve the historic significance of Haringey's heritage assets, their settings, and the wider historic environment. The</p>	For typographical correction and to address comments raised by Highgate Society and	28/23/6.2 15/29/6.2	Support changes proposed.

		<p>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.</p> <p>Where archaeological excavation is required, findings should be published, disseminated, and used as the basis for archaeological interpretation on site.</p> <p>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.</p> <p>All development shall protect the Strategic view from Alexandra Palace to St Paul's</p>	<p>English Heritage and to reflect PPS5.</p>		
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			Cathedral and key local views".			
6.2 SP12 Conservation	6.2.1		The Council 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. Where archaeological excavation is required, findings should be published, disseminated, and used as the basis for archaeological interpretation on site. 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	To address comments raised by English Heritage.	15/30/6.2.1	<p>We would seek further clarification for this additional paragraph and the added value it provides. The concern is much of the text repeats the proposed changes in wording of Policy SP12.</p> <p>On considering our submitted comments the focus of our concerns related to the policy wording. Additional changes to the supporting text we directed towards the need to identify a wider range of heritage values which the historic environment holds for the community as a basis in which to justify for SP12. Examples given included supporting local economic competitiveness and promoting community cohesion through shared culture and identity. We note that this point has been addressed below.</p>

			the historic environment. All development shall protect the Strategic view from Alexandra Palace to St Paul's Cathedral and key local views.			
6.2 SP12 Conservation	6.2.2		After first sentence of paragraph 6.2.2 insert the following: "It also supports local economic competitiveness (by providing attractive places for people to live and work) and promotes community cohesion through shared culture and identity.	To address comments raised by English Heritage.	15/31/6.2	Support changes proposed.
6.2 SP12 Conservation	6.2.2		Second sentence to start with: "The borough's built form" instead of "Its built form".	LBH correction and to make sense with the change at the beginning of the paragraph in line with comments made by English Heritage.	15/31/6.2	Support changes proposed.

6.2 SP12 Conservation	pg. 147	Indicators to monitor SP12	Amend 6th indicator to read: "Complete Conservation Area Appraisals and Conservation Management Plans for each of the Conservation Areas within the borough". Amend 7th indicator to read: "Increase the number of buildings put forward for statutory listing (where there is proper justification and where they meet certain criteria)"; and	In line with comments received from English Heritage.	15/33/6.2	Support changes proposed.
6.2 SP12 Conservation	pg. 147	Key evidence and references	Replace PPS15 with Planning Policy Statement 5 Planning for the Historic Environment (2010), supported by the Historic Environment Planning Practice Guide (2010), set within the context of the Government's Statement on the Historic Environment for England (2010), and throughout the Core Strategy where appropriate.	To address comments raised by English Heritage.	15/34/6.2	Support changes proposed.
6.3 SP13 Open Space and Biodiversity	148/6.3 .1		In second sentence after word 'play' insert 'heritage',	For consistency and in line with comments received from	15/35/6.3	Support changes proposed.

				English Heritage.		
6.3 SP13 Open Space and Biodiversity	150/6.3.3		Last sentence should read: '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 detract from the overall openness and character of the site, the appearance and historical significance of the setting, or harms the public enjoyment.'	For clarity and in line with comments received from English Heritage.	15/37/6.3	Support changes proposed.
7.1 SP 14 Health and Well-being	162/7.1.1		Second sentence should read: 'A wider sense of well-being is influenced by a variety of factors such as opportunities for work and recreation, attractive historic environments, personal relationships and feelings of safety and community.'	For consistency and in line with comments received by English Heritage.	15/39/7.1	Support changes proposed.
7.2 SP 15 Culture and Leisure	175	SP15 Culture and Leisure	Bullet point 3 should read: 'Protecting and enhancing, where feasible, existing cultural facilities and access to cultural heritage throughout the borough.'	For clarity and in line with comments received from English Heritage.	15/40/7.2	Support changes proposed.
8.2 Delivering and	198/8.2.13		At end of paragraph insert: '(guidance is provided in	Improved referencing	46/6/8.2	Support changes proposed, subject to the historic environment being identified as a potential

Monitoring the Core Strategy			SPG10a The Negotiation, Management and Monitoring of Planning Obligations (2006), this will be superseded by the emerging DM DPD which will provide further guidance on Planning Obligations and CIL).'	and in line with comments received by English Heritage and HUDU.		beneficiary from future Planning Obligations and CIL
9.5 Appendix 5	232	Glossary of Terms	Insert definition of Tall Buildings to read: "Buildings or structures that are significantly taller than surrounding development".	For clarity and in line with comments received from English Heritage.	15/28/6.1	Support changes proposed subject to the definition of tall buildings being expanded to reflect CABE/EH Guidance on Tall Buildings (2007) para 4.1. The following changes are proposed:  <i>Buildings or structures that are significantly taller than surrounding development <u>and/or which significantly change the skyline.</u></i>