

Haringey Core Strategy – examination in public

Further written information by Chris Mason.

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Which matter /issue it relates to?

Community involvement and interaction through the formulation and consultation phases, and confusing / diluting attention to the Core Strategy by co-consultation on other policies and site proposals in the same 6 week period.

Which particular part of the core strategy is unsound?

All of it, but in particular I am concerned about Town Centres and Conservation Led regeneration and Open spaces, particularly the recording of boundaries thereto see separate documents.

Which soundness test (s) it fails?

Lack of certainty, Failure to comply with published spirit of the Statement of Community Involvement, unwillingness to produce a new Proposals Map for scrutiny and input / debate.

Why does it fail?

Process not resourced properly – see detailed discourse below.

How can the core strategy be made sound?

Stop the process and cause the authority to go back and undertake the processes it should have initiated and bring the results to a reconvened Examination when the tasks are complete.

Unacceptable and unsound to have no Proposals Map in draft for a London situation and UDP map with tweaks is inappropriate.

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

In particular production of a Proposals Map showing areas for intensification or significant change, detailed mapped boundaries of Green Belt and MOL that should not change, but have been changed since original designations and this means there have been designations and de designations by stealth. This must be put right once and for all with a new DRAFT map for discussion and inclusion in the finalised Core Strategy after scrutiny.

Discourse on soundness issues

1. 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).

2. 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.
3. 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.
4. 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.

5. 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.
6. 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.
7. 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.
8. 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.
9. 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.

10. 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.
11. 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.
12. 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.
13. 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.

14. The Core Strategy needs to be more, in some respects, 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. It should also be brief and concentrate on just the Strategic issues and less detail.
15. This piece of work appears to be little more than a UDP rolled forward and this is evidenced 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 my third submission. There were problems in the past that have never been challenged and need to be corrected.
16. 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.

17. 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.