

## Haringey Core Strategy Indicative Matters and Issues for Examination

### Matter 7: Design and Conservation

#### Key issue:

*Is the approach of the CS to design and tall buildings justified by the evidence base and the most appropriate strategy when considered against alternatives within the context of Haringey and with particular regard to the historic environment?*

- i. The evidence base used to justify the policy on design is described in more detail in secondary issue no. 2, section 7.2 and issue no. 7, section 7.7, below where a considerable evidence base is identified.
- ii. The consideration of alternatives to the approach of the Core Strategy to Design is described in more detail in secondary issue no. 2, section 7.2, below, but can be summarised as being that alternative design policies were considered at the Issues and Options stage of preparation of this Core Strategy, but decided by the time it reached the Preferred Options stage.
- iii. We consider that the context of Haringey, in particular its historic context, would generally be improved by good design as appreciation of context is accepted as an important component of good design. This is evident in Building for Life criteria 6 (Is the design specific to the scheme?), 7 (Does the scheme exploit existing buildings, landscape or topography?) and 14 (Does the scheme integrate with existing streets, paths and surrounding development?).
- iv. The evidence base, alternatives and appropriateness for tall buildings within the context of Haringey and with particular regard to the historic environment is identified in issue 3, section 7.3 below

#### 1.0 Issue 7.1

*Is the CS in conformity with the LP and its draft replacement?*

- 1.1 Policies SP 11 and 12 covering Design and Conservation are considered to be in general conformity with the current London Plan and its draft replacement for the reasons set out below.
- 1.2 **The London Plan, Consolidated with Alterations (2008):-** Policy 4B.1 Design Principles for a Compact City sets general principles, many covered in detail in other London Plan policies,
- 1.3 4B.2 Promoting World Class Architecture and Design seeks to collaborate with partners to encourage contemporary and integrated designs, promote community involvement, competitive selection of designers, design led change and design guidelines. Haringey

supports all of these in the first bullet to SP 11 development is required to be of the highest standard of design etc.

- 1.4 4B3 Enhancing the Quality of the Public Realm; conformity with this is achieved in the 4<sup>th</sup> bullet point of SP11.
- 1.5 4B.4 Retrofitting is not considered relevant to Design & Conservation; conformity with this policy is achieved in Policy SP4 discussed in Matter 3, and no consultation responses questioned the council's approach on this.
- 1.6 4B.5 Creating an Inclusive Environment; conformity with this is achieved in the 5<sup>th</sup> bullet point of SP11.
- 1.7 4B.6 Safety, Security and Fire Prevention and Protection; conformity with this is achieved in the 3<sup>rd</sup> bullet point of SP11.
- 1.8 4B.7 London's Resilience and Emergency Planning is not considered relevant to Haringey, being more related to strategic regional planning and for boroughs covering areas of central London.
- 1.9 4B.8 Respect Local Context and Communities; conformity with this is achieved in the 1<sup>st</sup> bullet point of SP11.
- 1.10 4B.9 Tall Buildings - Location and 10 Large Scale Buildings - Design and Impact; conformity with these are achieved in the last paragraph of SP11 (as amended) and discussed in more detail below at Issues 7.3 and 4.
- 1.11 **The Consultation Draft Replacement London Plan (2009):-** Policy 7.1 Building London's Neighbourhoods and Communities places more emphasis on locating infrastructure, dealt with in policy SP16 of this Submission Draft Core Strategy (CS). However it does introduce in 7.1C a concept of "Lifetime Neighbourhoods" that can be cross referenced to our design policies on accessibility in the 5<sup>th</sup> bullet point of SP11 and in 7.1D that "the designs of new buildings and spaces they create should help reinforce or enhance the character, legibility and permeability of the neighbourhood". This latter goes to the heart of the principles behind our design policy in SP11.
- 1.12 7.2 An Inclusive Environment; conformity with this is achieved in the 5<sup>th</sup> bullet point of SP11.
- 1.13 7.3 Secured By Design; conformity with this is achieved in the 3<sup>rd</sup> bullet point of SP11.
- 1.14 7.4 Local Character; conformity with this is achieved in the 1<sup>st</sup> bullet point of SP11.
- 1.15 7.5 Public Realm; conformity with this is achieved in the 4<sup>th</sup> bullet point of SP11.

- 1.16 7.6 Architecture; conformity with this is achieved in the introductory paragraph, 1<sup>st</sup> 2<sup>nd</sup> and 4<sup>th</sup> bullet points of SP11.
- 1.17 7.7 Location and Design of Tall and Large Buildings; conformity with this is achieved in the last paragraph of SP11 (as amended) and discussed in more detail below at Issues 7.3 and 4.

*How is it intended that the Council's LDF will address design issues within the Borough?*

- 1.18 "By Design – Urban Design in the Planning System: Towards Better Practice" (ODPM, CABE 2000) sets out the following seven design objectives:

- Character – a place with its own identity
- Continuity and enclosure – a place where public and private spaces are clearly distinguished
- Quality of the public realm – a place with attractive and successful outdoor areas
- Ease of movement – a place that is easy to get to and move through
- Legibility – a place that has a clear image and is easy to understand
- Adaptability – a place that can change easily
- Diversity – a place with variety and choice

These form the basis of the concept of Design Issues that inform Haringey policies to support this.

- 1.19 In addition to the broad strategic policies proposed for the Core Strategy, detailed policies to implement high standard of design including general principles of Good Design and specific design guidance, for instance for shopfronts and basements are included in our emerging Development Management DPD, replacing in most cases similar policies in our UDP and adopted and draft Supplementary Planning Guides.
- 1.20 Design issues are further supported by our SPDs, particularly Housing (adopted October 2008), which amongst other things sets design standards for housing developments from domestic extensions and conversions to large scale new build developments. This will be supplemented later this year when the Mayor of London adopts his Housing Design Guide, which is already being used as guidance, will be referenced in the soon to be adopted replacement London Plan and will be given robust support when the mayor produced his Housing Design SPD next year.
- 1.21 Our Open Space and Recreation SPD (adopted March 2008) supports the importance of good design for accessibility and safety (paragraphs 1.31 and 1.32) but unfortunately not for other functional and aesthetic benefits. Our House Extensions in South Tottenham SPD (adopted October 2010) supports good design in allowing certain forms of roof

extension in this corner of the borough with a particular need for design solutions to overcrowding of large families; single family houses are permitted to be extended (subject to planning permission) with an additional floor, provided they follow rigorous design requirements to maintain and improve visual, amenity and sustainability standards. The emerging Sustainable Design & Construction SPD (currently draft, due to be adopted shortly), supports good design particularly in the guidance on choice of materials, Chapter 9, Avoiding Waste - Building Construction. This also includes a Timber Cladding Code of Practice that emphasises the necessity of good design to detail timber cladding for durability and consistent, attractive appearance.

- 1.22 Haringey has adopted Streetscape Guidance (2008 - prepared by Frontline Services in consultation with Design and Conservation officers) to ensure good design of streetscape and the public realm.
- 1.23 Haringey has also developed a robust procedure for ensuring high standards of design through the pre application stages to the processing of planning applications, including:
  - encouragement of formal Pre-Application meetings with planning and other relevant officers, including where appropriate Design and/or Conservation Officers,
  - availability of a “drop-in” or on line free informal pre-application advice service for small domestic schemes,
  - consideration of all major schemes by the Haringey Design Panel, including all residential schemes for more than 10 units,
  - Building for Life assessments for all major residential and mixed use schemes,
  - Opportunities for the whole community to be informed, comment on and be involved in influencing the design of schemes from pre-application through the formal application process.
  - Consideration of Design Panel comments and Building for Life assessments formally incorporated into consideration of Planning Applications and given their own sections within Planning Committee / Delegated Powers Reports.

Taken together we consider these will ensure the planning system will strongly encourage good design.

- 1.24 For more detail on the Haringey Design Panel, see Issue 7.7 below.
- 1.25 Building for Life is a national standard for well designed homes and neighbourhoods, devised by CABI and the Home Builders Federation in 2005, backed by the Housing Corporation, English Partnerships, Design for Homes and the Civic Trust. Fully revised in 2008, it refines all the most relevant factors determining good design into 20 questions that ask whether the proposal would be attractive, functional and sustainable. It is used by the Homes and Communities Agency (successor to the Housing Corporation), who require schemes

they fund in part or whole or provide land for to achieve at least a score of 14. Annual national awards are also given to the built schemes achieving the highest scores.

- 1.26 Haringey has trained assessors within planning staff to carry out objective Building for Life assessments, and have put in place procedures that every wholly residential or residential led mixed use development for 10 units or more are assessed during the planning application process. There is then provided a section for Building for Life assessment in every relevant Planning Committee or Delegated Powers Report. Haringey has adopted the standard that where a relevant scheme fails to achieve a BfL score of 14 or more, it will generally not be approved, on grounds of failing to represent Good Design, and monitor this as part of our Annual Monitoring Report (AMR).
- 1.27 The general public in the wider community also get the opportunity to comment on and influence design decisions that will affect their community. Community involvement in design is addressed in our Statement of Community Involvement (SCI), adopted in 2008 and updated in February 2011. This explains how the local community, businesses, voluntary and community organisations and others can influence and shape planning outcomes in the borough through involvement in the preparation and reviewing of the LDF, including those documents affecting design policy and through consultation on planning applications, including designs of proposals.
- 1.28 Haringey encourage applicants of major or sensitive applications to undertake early community involvement before applications are formally submitted, using the mixture of consultation tools listed in Appendix 2 of the SCI to achieve meaningful engagement with the communities likely to be affected by their proposals. The SCI provides full details of the extensive, thorough and inclusive ways the Council consults with stakeholders, the local community, businesses, voluntary and community organisations and others.

## **2.0 Issue 7.2**

*What is the evidence base in support of SP 11 and is it robust? What alternative approaches have been discounted and why?*

- 2.1 Evidence in support of policy on Good Design can be found in the current and emerging London Plans, CABI, English Heritage Guidance, and other national guidance.
- 2.2 Further evidence for the need for policy on design can be found in various supporting documents we refer to including Masterplan Frameworks for Tottenham Hale and Haringey Heartlands, area based SPDs for Tottenham Hale Urban Centre, Haringey Heartlands, Lawrence Road and Wood Green Town Centre, policy based SPDs for

Housing, House Extensions in South Tottenham, the draft Sustainable Design & Construction SPD and the current existing Unitary Development Plan, particularly policies UD3 General Principles and UD4 Quality Design. All are discussed in more detail in Issue 7.7 below.

- 2.3 Government planning policy in PPS1 Delivering Sustainable Development, PPS3 Housing, PPS5 Planning for the Historic Environment, PPS6 Planning for Town Centres and PPS12 Local Development Frameworks all support the importance of good design in planning policy, discussed in more detail in Issue 7.7 below.
- 2.4 National initiatives used in development that support good design include Building for Life, Lifetime Homes and Secured by Design all are discussed in more detail in Issue 7.7 below.
- 2.5 The robustness of policies on good design are explained in Issue 7.7 below, for tall buildings see Issues 7.3 and 4.
- 2.6 In addition to conformity with the current and emerging London Plans discussed above in Issue 7.1, conformity with national policy and guidance is detailed in Issue 7.7 below.
- 2.7 A number of alternatives for the broad strategic approach to design were considered at the Issues and Options stage. By the time it was considered at the Preferred Option stage, it was considered that “there is no alternative to good design and having regard to the design principles as set out in the London Plan. The London Plan promotes good design and its design principles meet SA objectives 3 (health) and 6 (access for all users)”.
- 2.8 The Preferred Option states:  
“The Council will require development to be of high quality design. Poorly designed schemes will be refused. Developments should:
  - Be of high design quality to ensure attractive, durable, and adaptable development;
  - Relate satisfactorily to the spatial and visual character of the site and the surrounding area / street scene;
  - Create or enhance high quality public realm;
  - Promote inclusive design that is accessible to all users;
  - Incorporate solutions to reduce crime and the fear of crime; and
  - Maximise energy efficiency, through methods of passive solar design, natural ventilation, use of vegetation on buildings and sustainable design and construction.”
- 2.9 The preferred option recognises good design goes beyond building design to include public realm, energy efficiency measures, noise and light pollution and sustainable construction, which offer potential for alternative uses over their lifetime. This meets London Plan requirements for sustainable residential quality. New development

schemes can provide an opportunity to shape places by improving the quality of buildings and the street environment and through this improve the experience of the borough for residents and visitors. Haringey will therefore insist on high quality design throughout the borough.

- 2.10 The Issues and Options consultation identified that the majority of residents supported quality in new design, specifically that developments should improve the character and quality of an area. This is recognised and supported by the London Plan.

### **3.0 Issue 7.3**

*Is the CS approach to tall buildings, within and outside Haringey Heartland and Tottenham Hale, justified adequately and robust? (adequate character assessment of Borough re sensitivity?)*

- 3.1 The question correctly points out that the CS proposes two different approaches to planning for tall buildings in two different types of areas of the borough. One is within the two Growth Areas identified in SP1 (which are correctly known as Haringey Heartlands / Wood Green Area of Intensification and Tottenham Hale Opportunity Area), the other being the whole of the remainder of the borough.
- 3.2 In the two Growth Areas (Haringey Heartlands / Wood Green and Tottenham Hale), we identify that tall buildings may be appropriate in certain locations. These areas have existing approved masterplan frameworks; the Tottenham Hale Urban Centre Masterplan SPD and the Haringey Heartlands Development Framework SPD, which have been consulted on and formally adopted in 2006 and 2005 respectively. They both contain identified sites that could be suitable for tall or large buildings. However it is also acknowledged in SP1 that Area Action Plans (AAPs) will be produced for both of these areas.
- 3.3 Elsewhere there is a blanket presumption against tall or large buildings, but that does not rule them out for ever and in principle, just whilst they are in absence of evidence of what sites could be suitable for tall or large buildings. We have agreed with English Heritage that to identify suitable locations for tall or large buildings there must first have been prepared an Area Action Plan with, as part of its evidence base, an Urban Characterisation Study (UCS).
- 3.4 The Council is committed in SP1 to preparing an AAP for each of those two Growth Areas and that these two AAPs will identify which if any specific sites are suitable for tall or large buildings. Furthermore, we commit to first preparing a UCS for the whole of each of these two AAPs as part of the evidence base for these AAPs; the UCSs will consider the physical, visual and spatial impact of any tall or large buildings proposed in those AAPs. Upon adoption, the assessments of suitable locations for tall buildings as part of this process will

supersede the existing SPDs, including their assessed locations suitable for tall buildings.

3.5 The same process will be carried through for other AAPs. As stated in Chapter 1 of the CS, we are planning AAPs for Wood Green, Northumberland Park, Seven Sisters and the Tottenham High Road Corridor. There may be locations suitable for tall buildings identified in any of these.

3.6 With the Inspector's agreement, the later part of the **Core Strategy policy SP11** on tall buildings will be amended to read as follows:

*'Applications for tall buildings will be assessed against the following criteria:*

- *an adopted Area Action Plan or existing adopted masterplan framework for the site and surrounding area;*
- *assessment supporting tall buildings in a Characterisation Study which should be prepared as supporting evidence for all AAP areas;*
- *compliance with the Development Management DPD criteria for Tall and Large Building siting and design;*
- *compliance with all the relevant recommendations as set out in CABE / English Heritage "Guidance on Tall Buildings", 2007.'*

3.7 With the Inspector's agreement, the **Supporting Text on Tall Buildings** will read:

*'6.1.15 to remain unaltered up to "...4-9 storeys". Then delete all and insert new paragraphs:*

***6.1.16** The Council has adopted the definition of **Tall and Large Buildings** as those which are substantially taller than their neighbours, have a significant impact on the skyline, are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London, as set out in the draft replacement London Plan policy 7.7.*

***6.1.17** As noted in policy SP1, the Borough will prepare **Area Action Plans (AAPs)** for the areas identified in Section 3.1. As part of the evidence base for each of these areas, an Urban Characterisation Study (UCS) will assess the urban character of each area concerned, including sufficient of the surrounding area to consider the context affected by the actions proposed in the AAP. These Characterisation Studies will examine the case for tall and large buildings and whether there are suitable locations within the area.*

***6.1.18** **Masterplan Framework** The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings, because they are close to major transport interchanges,*

*have been designated in the London Plan as an Opportunity Area (Tottenham Hale) and an Area for Intensification (Haringey Heartlands/Wood Green) and have existing adopted Masterplan Frameworks<sup>1</sup>. Any AAPs and associated Characterisation Studies for these areas will supersede these established suitable locations for Tall and Large Buildings with their recommended locations (if any). Elsewhere tall buildings are considered inappropriate to Haringey's predominantly 2-3 storey residential suburban character until shown otherwise in AAPs and UCSs.*

**6.1.19**        *The Criteria for Siting and Design of Tall and Large Buildings will be described in detail in the Development Management DPD.*

**6.1.20**        *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 for tall buildings and promotes a plan led approach to tall buildings*

*1....The Haringey Heartlands Development Framework (adopted 2005) and the Tottenham Hale Urban Masterplan Supplementary Planning Document (adopted October 2006)*

3.8 We are considering a DM DPD policy for Tall and Large Buildings: Siting and Design, which will be the "Criteria for Siting and Design of Tall and Large Buildings" and will provisionally read:

*'Applications for tall buildings will be assessed against the following criteria:*

- *an adopted Area Action Plan or existing adopted masterplan framework for the site and surrounding area;*
- *assessment supporting tall buildings in a Characterisation Study which should be prepared as supporting evidence for all AAP areas;*
- *the potential contribution to placemaking & legibility;*
- *the highest quality design;*
- *the appropriate relationship to both local and historic context;*
- *the careful and comprehensive consideration of impact on ecology and microclimate;*
- *appropriate infrastructure provision, including excellent public transport; and*
- *compliance with all the relevant recommendations as set out in CABE / English Heritage "Guidance on Tall Buildings", 2007.'*

#### 4.0 Issue 7.4

*How will tall buildings be managed in their delivery?*

- 4.1 The key is commitment to producing a series of Area Action Plans (AAPs) and Urban Characterisation Studies as part of the AAP Process and as described above under Issue 7.3.

#### 5.0 Issue 7.5

*Does the CS acknowledge adequately issues of embodied energy in existing buildings, particularly in the context of redevelopment and sustainability?*

- 5.1 Haringey Council acknowledge the importance of the embodied energy in existing buildings in the context of redevelopment and sustainability but do not find it necessary to repeat it here in the Design and Conservation policies. Chapter 4 and in particular Policy SP4 contain broad strategic policies on sustainability but more detail is contained in our draft Sustainable Design & Construction SPD, which has been consulted on and is expected to be adopted shortly.
- 5.2 The Sustainable Design & Construction SPD, which will be supported further in the emerging Development Management DPD, contains detailed guidance on many aspects of sustainability in building and development, including acknowledging the significance of the existing building stock. Its Chapter 9, Avoiding Waste and Minimising Landfill, particularly 9.2, Reuse of Existing Buildings, 9.3, Reuse of Building Elements, 9.4, Designing Adaptable, Long - Life Buildings; including Designing for “loose fit” buildings and 9.5, Use of Low Impact Building Materials; including Minimising of Transport Costs for Building Materials and Embodied Energy, contain extensive, detailed guidance that more than adequately acknowledge embodied energy in building.
- 5.3 Our website contains more advice on materials and building components, particularly with regards to buildings in conservation areas, were for instance we advise that original timber windows should not generally be removed, particularly for replacement with  $\mu$ PVC, but we would encourage other measures first, such as draft proofing, repairs, other energy saving measures inside the home, and ultimately secondary glazing. In the case of Conservation Areas and Listed Buildings, where planning allows we seek to preserve original materials for heritage reasons but acknowledge, including on our Conservation Area website, the environmental reasons for retention of existing materials and components, including embodied energy.
- 5.4 We further acknowledge the importance of adapting the existing building stock if we are to mitigate and adapt to climate change in the importance we place on policies on retrofitting for insulation, reduced carbon use and local generation. This can be found in the CS itself in section 4.1.23-4, Existing Housing Stock which acknowledges “The

existing housing stock represents a large proportion of carbon emissions in Haringey. Haringey's interactive heat loss map indicates that many existing houses are very inefficient. Much of the housing standing today will still be in use in 2026". This is amplified in the draft Sustainable Design & Construction SPD Chapter 4, Towards a Low Carbon Borough", particularly section 4.13, Refurbishments.

- 5.5 This is being implemented by the Borough in a series of pilot schemes by affordable housing partners such as the Metropolitan Housing Trust's zero carbon retrofitting pilots at Clyde Road and Hawthorne Road (the latter in the Campsbourne Cottages Conservation Area, demonstrating potential compatibility with building conservation policies).
- 5.6 A more widespread pilot scheme is the Muswell Hill Low Carbon Zone, an initiative by Haringey Council and the Energy Savings Trust to offer incentives and encouragement, set up buying networks and generate enthusiasm to get homeowners and institutions to upgrade existing buildings to reduce carbon consumption and increase energy efficiency, through simple insulation measures such as loft insulation and double glazing, through low carbon energy generation such as solar panels and through consideration of full house or rear only external insulation. Parts of the zone are in conservation areas, and consideration of the restrictions and legitimate heritage considerations have been taken into account. We have assisted by preparing a simple guide to planning constraints and opportunities for low carbon retrofitting measures, and have cooperated with other boroughs in North London in working towards a publishable guide.
- 5.7 These initiatives built upon the pair of simple householder guides we produced, Greening Your Home (2007) and Use of Renewable Energy Systems (2008), which offer clear, simple householder advice for adaptation and mitigation measures for the existing housing stock. Greening Your Home is aimed at all householders and has been widely distributed, and Use of Renewable Energy Systems is effectively a supplement, specifically aimed at historic buildings and conservation areas.
- 5.8 Therefore the embodied energy of existing buildings is strongly supported by our broader policies and actions, both in direct preservation but also importantly in encouraging adaptation where appropriate. For we will only be able to reduce carbon emissions sufficiently, adapt to climate change, meet fuel poverty reduction aspirations and conserve heritage if we can provide ways for existing building fabric to be adapted.

## 6.0 Issue 7.6

*Does SP 11 incorporate sufficient clarity and referencing to the Council's approach to achieving more sustainable development?*

- 6.1 SP11 contains policy and supporting text on sustainable design and construction; the supporting text cross references to policies on climate change in SP4. This is consistent with the intended strategic focus of the Core Strategy; detailed policies will be contained in the DM DPD, which will reference the even more detailed policies in the Sustainable Design & Construction SPD, which, as explained above, is currently draft but expected to be adopted shortly.

## 7.0 Issue 7.7

*Is there adequate clarity on what is meant by 'high quality'? Will SP11 be effective in such regards?*

- 7.1 Good urban design is essential to the creation of places that are economically, socially and environmentally successful. High quality urban design has been demonstrated to enhance inward investment, reduce crime, and deliver regeneration, new jobs, public safety and quality public spaces.
- 7.2 The seven objectives of good design from "By Design" by CABI are quoted above under Issue 1 and provide a good definition of good design. Numerous other CABI documents define good design from their first report, "The value of urban design" in 2001.
- 7.3 Good Design is also defined in PPS1 Delivering sustainable development, which states: "Good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development. Good design is indivisible from good planning" (para 33). PPS 3 Housing states: "Developments should be attractive, safe and designed and built to a high quality" (para 1).
- 7.4 Haringey implement good design in a number of ways through the planning process and through other activities. Three of the main ways used by the Planning Policy, Design and Conservation team are Design Awards, the Design Panel and Building for Life.
- 7.5 Building for Life provides guidance to achieving good design in larger residential and residential led mixed use schemes; it is appropriate for almost all schemes for over 10 units. It is divided into 20 different criteria, which recognises that good design requires excellence in many interrelated but different factors, but that not all factors or criteria need to be notable achievements in every development. Awards are given annually to developments achieving 16 (silver) or 18(gold) of the 20 criteria in BfL. The Homes and Communities Agency (HCA) has adopted a requirement that all developments

achieve 14 for all developments which receive their funding (for any part) or land contributions.

- 7.6 Haringey Council as a planning authority is also committed to using BfL as part of the process of assessing planning applications for all major residential or mixed including residential developments (10 units or more) as described in Issue 1 above, which also describes the robust procedures we have adopted for embedding this into the process of deciding planning applications.
- 7.7 The Haringey Design Panel greatly assist in monitoring and improving the quality of design of major schemes seen by it, and Haringey are committed to ensuring major developments are reviewed by the Design Panel. The Terms of Reference of the Design Panel were agreed in November 2005 and is currently undergoing review by the panel, with a draft being produced for discussion in April this year. The draft Terms of Reference are attached for information at the end of the document. The function of a design panel is to give independent urban design advice on key development applications. The Panel does not have decision-making powers; rather it acts in an advisory role. Membership is made up of people who live or work in Haringey who voluntarily give their expertise in an advisory capacity, acting as a peer review of major schemes at pre-application stage, giving *independent, expert and unbiased* urban design advice on key development applications. The format of the panel is based on good practice advice particularly CABE, whose “Design Review Principles and practice” (2009) and Urban Design London’s earlier draft guidance (2008) support our current procedures.
- 7.8 Proposals are generally seen by the design panel at pre-application stage. Haringey has adopted a procedure that all residential or residential led mixed use schemes for more than 10 units, and all non residential schemes of equivalent size, or are significant public realm or heritage asset changes are seen by the panel. The panel is chaired by the Assistant Director of Planning and regeneration, but produces its views independently; a member of Planning Policy, Design and Conservation Team staff takes minutes and produces a report on each scheme seen, which is checked by panel members. The agreed report is then issued to applicant and development Management case officers. It remains confidential until a formal planning application is made; it is then published on the web page for the application and treated as a consultation response as part of the application. Development Management Case Officers will consider what changes have been made to ye proposals since the panel and report on the Design panel as part of the Planning Committee / Delegated Powers Report on the application.
- 7.9 Another major way in which Haringey seek to celebrate and encourage good quality design of buildings and spaces is through the Haringey Design Awards. The Haringey Design Awards have been run every

three years since 2005, and we are intending to hold them again later this year. Awards are granted in several categories, public and private, new build and refurbishment, the precise names of which have varied, and one overall award winner is then declared; in 2005 it was given to the Alexandra park School arts, drama and science extensions, in 2008 to Finsbury Park improvements. The awards are administered by the Planning Policy, Design and Conservation Team and judged by a panel made up of the independent members of the Haringey Design Panel.

- 7.10 We also closely monitor and encourage the entry of successful schemes into various National Awards for Design and have had a number of such successes in recent years, including the National Housing Design Awards for housing at Connaught Gardens in 2010 with two nominated this year, Civic Trust awards for the Triangle Youth Centre in 2010 and Coleridge School this year, RIBA regional awards for the Linear House, Southwood Lane in 2008 and many others.
- 7.11 Good design is also required and encouraged as part of various design standards imposed additional to our specific policy, during the planning and procurement processes, especially for housing. Examples are Housing Design Standards, Lifetime Homes and Secured by Design.
- 7.12 The Mayor of London is preparing London Housing Design Guide (LHDG) which will improve the design standard of all new major housing schemes in London. They have been prepared by Design for London, the Mayor's own design advice team, and the London regional office of the Homes and Communities Agency (HCA), who fund, monitor and regulate many affordable housing projects on behalf of the Government. The interim edition of the guide, produced in 2009 following extensive consultation and research including into cost and impact on the housing market, can be used as guidance for any project. However the HCA require conformity to the LHDG for all housing funded or part funded by them or on land they provide from April this year, and the Mayor of London similarly requires it for all housing on land provided via the London Development Agency (LDA). The new emerging London Plan also cites the same standards in its policies for more strategic aspects of housing and the Mayor intends to produce a Supplementary Planning Document that will require all large scale new housing developments to conform to the LHDG from some time next year.
- 7.13 The planning process also seeks to ensure proposals for new housing meet the standards in Lifetime Homes which ensure housing is accessible and adaptable, particularly to the elderly and disabled. The concept of Lifetime Homes was developed in the early 1990s by a group of housing experts. Lifetime Homes are ordinary homes incorporating 16 Design Criteria that can be universally applied to new

homes at minimal cost. Haringey and Greater London planning policies already require the Lifetime Homes standard in new developments. All public sector funded housing in England will be built to the Lifetime Homes standard from 2011, with a target of 2013 for all private sector dwellings. The Foundation for Lifetime Homes and Neighbourhoods consists of Age UK, TCPA, RADAR and Habinteg, who took on responsibility to promote the Lifetime Homes Standard and provide resources to other organisations seeking to implement the standard from the Joseph Rowntree Foundation.

- 7.14 Finally the planning process also seeks to ensure all developments meet the standards of Secured by Design and Safer Places that focuses on crime prevention at the design, layout and construction stages of homes and commercial premises and promotes the use of security standards for a wide range of applications and products. Secured by Design (SBD) is owned by the Association of Chief Police Officers (ACPO) and is the corporate title for a group of national police projects focusing on the design and security for new & refurbished homes, commercial premises and car parks as well as the acknowledgement of quality security products and crime prevention projects. Being inherently linked to the governments planning objective of creating secure, quality places where people wish to live and work, Secured by Design has been cited as a key model in the Office of Deputy Prime Minister's guide '*Safer Places - The Planning System & Crime Prevention*' and in the Home Office's '*Crime Reduction Strategy 2008-11*'.

## 8.0 Issue 7.8

*Is SP 12, as reworded in the Schedule of Minor Changes, sufficiently flexible so as to be effective? What is the evidence base in support of SP 12, is it compliant with PPS5 (Practice Guide) and is it robust?*

- 8.1 We believe SP12 is sufficiently flexible. It has been written to conform to PPS5, the government's new national guidance on planning for the historic environment (adopted March 2010) and follows the balance in PPS5 between development and preservation; for instance the "special attention to the desirability of preserving or enhancing the character and appearance of conservation areas" required by the Planning (Listed Buildings and Conservation Areas) Act 1990 and the desirability of development and change, especially to mitigate and adapt to climate change and ensure economic prosperity.
- 8.2 However Haringey policy in SP12 and elsewhere also reflects national policy in PPS5 and elsewhere in pointing out that there is not a conflict between taking into account the historic environment and encouraging sustainable development. It is recognised that preservation of heritage assets will often depend on securing for it a viable economic future, so that much of the borough's historic environment preservation initiatives, such as the Heritage Economic Regeneration

Scheme (HERS) which is in conjunction with English Heritage and the Heritage Lottery Funded Townscape Heritage Initiative (THI) are directed at those areas such as Tottenham High Road where the local economy is weaker and cannot easily generate viable schemes to protect heritage assets without assistance, rather than areas such as Highgate where the local economy can support viable schemes that preserve and enhance heritage assets without assistance. We consider it goes further than just preservation for heritage sake though, that preserving and enhancing heritage assets in economically deprived areas of the Borough improve chances for the local economy by improving the local environment, the appearance of streets, quality of properties that would often not be replicated in a new building, the potential of tourism, local pride in the area, opportunities for local skilled craftspeople to carry out the work etc.

- 8.3 The preservation and enhancement of heritage assets is also recognised to make a positive contribution to adapting to and mitigating climate change, recognised in Haringey and government policy. The retention and reuse of heritage assets avoids the materials and energy costs of new development, historic buildings often have a healthier and more sustainable environment in terms of natural lighting and ventilation, slower water runoff and greater biodiversity. These are recognised in Chapter 4 of the CS and detailed more thoroughly in our draft Sustainable Design & Construction SPD. This is mentioned specifically in PPS5, policy HE1 but it would be unnecessary for us to repeat this.
- 8.4 Haringey's Heritage Assets are listed in 6.2.1 of the Core Strategy
- 8.5 These Heritage Assets have been designated over many years (as an example, Highgate Conservation Area was designated back in 1967) on the basis of the professional planning assessments made at the time, and these designations were Adopted by the Council. Their heritage importance has been acknowledged by successive Haringey UDP's and their Planning Policies. This Adoption is valid primary evidence base for all these assets in support of SP12.
- 8.6 Regrettably the evidence base is not up to date; it would be ideal to have detailed appraisals of all heritage assets fully in accordance with EH guidance to define its 'significance'. Only 12 of the 29 Conservation Area's have Adopted Character Appraisals in accordance with EH guidance and accordingly the defence of conservation areas without adopted appraisals from 'predatory' planning applications can be much more difficult to resist. Clearly their protection would be more secure with adopted appraisals. Accordingly it is acknowledged that for many of the Conservation Area's the evidence base is not 'robust'.

## 9.0 Issue 7.9

*What evidence indicates 'key local views' (6.2.18), what is the timetable for the Conservation SPD, what happens in the interim?*

- 9.1 The character of an area depends in views in, out and within. The significance of these views to local people has often been undervalued in the past. However, it is only when planning applications are being considered that the importance of views has become apparent. We intend to acknowledge and analyse the significance of local views with a view to producing a consultation paper consisting of a schedule of suggested local views worth particularly preserving. It is intended this will eventually form part of the planned Conservation SPD. However the draft schedule of local views will be produced before the first draft of the rest of the SPD.
- 9.2 The locally important views identified in the 1998 Haringey UDP will form a good starting point for the proposed policy and schedule. Policy DES 4.2, Locally Important Views, on page 170, stated: "The Council will seek to protect and where possible enhance local views, vistas, panoramas and views of landmarks. Views to be protected will be identified in consultation with local residents and amenity groups. An initial schedule of local views and landmarks to be protected is included here as policy. Views will be evaluated according to their interest as panoramas, vistas, landmarks, townscapes or special historic interest. Additional views may be identified through the Plan Review process, or in Planning Briefs or as Supplementary Planning Guidance".
- 9.3 The 1998 UDP then followed that with its initial list in Table 9, which we will use as part of our initial list, although we acknowledge that these views will have to be re-tested to check they remain valid. The preparation of Area Action Plans (AAPs) and the Urban Character Studies that will accompany them, will provide another opportunity for capturing and analysing locally significant views. The Mayor of London's draft Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) recently produced for internal consultation with stakeholder organisations including the Council, also contains some significant local views for the area considered for that policy, and amongst our comments we have suggested additional views for that. Also the London Borough of Waltham Forest are producing an AAP for their Blackhorse Lane area, close to the border with Haringey. We will consider including views identified in either of these and any other neighbouring plans in our document.
- 9.4 The views described and elegantly mapped in the ULV OAPF are very good and helpfully much more specific than the 1998 UDP, particularly section 4.6, pages 66-9 in the "January 2011 Stakeholder Consultation" version of the document.

- 9.5 We have made a start on listing which other views are important across Haringey and putting more detail to the views on the 1998 UDP, both for use in a separate policy document and in each of the AAPs we eventually produce. The first draft list of local views is expected to be produced within the next year.

#### 10.0 Issue 7.10

*Is the London View Management Framework referenced adequately within the CS?*

- 10.1 Paragraph 6.2.1 has been amended in the Schedule of Proposed Minor Changes to, amongst other changes, add the sentence: *'All development shall protect the Strategic view from Alexandra Palace to St Paul's Cathedral and key local views'*.
- 10.2 The only additional item that could make it completely clear that the policies of the London View Management Framework is thoroughly incorporated into Haringey planning policy would be to actually reference the Mayoral SPG in the supporting text. We therefore propose, with the Inspector's agreement, to insert a specific reference to the actual Mayoral SPG be added at the end of paragraph 6.2.1 (straight after the sentence added as noted in the paragraph above). The following should be added after "St Paul's Cathedral", before "and key local views": *'as protected in the London Mayoral "London View Management Framework" Revised SPG, July 2010'*.

#### 11.0 Issue 7.11

*Is the heritage significance of Alexandra Palace and its environs recognised adequately within the CS?*

- 11.1 The building itself is a Statutory Listed Building, but is only Grade II Listed, the lowest statutory national listing category. The building was only listed in October 1996, 49 years after listing was introduced, after being turned down for listing several times. As such it is one of 438 Grade II Listed Buildings in Haringey, compared to 27 buildings with the more significant Grade II\* Listing and six buildings with the highest Grade I Listing, which should rightly be our highest priority. Listing followed extensive restoration of severe damage from a fire in 1998, the second fire following one only just after completion in 1873. Some parts have moderate architectural interest; others are primarily of historic interest, particularly the BBC studios of 1935.
- 11.2 However it does have considerable iconic status by virtue of its use as a "peoples palace", recently mostly for exhibitions and events, and particularly by virtue of its visibility from wide areas of North London on a prominent hill overlooking a wide panoramic view of the West End, City of London, Docklands and the East End, and its setting in a large, popular and successful park. This is set out in Section 1 of the Core Strategy, and is reflected in its status as one of the points from

which the London wide views in the Mayoral London View Management Framework are taken and in its status within Haringey's local views, many of which are of the palace (for further details see Issue 7.9 above).

- 11.3 Alexandra Palace does therefore have some significance as a Designated Heritage Asset and any proposals to alter it would have to assess their effect on the significance of the heritage asset. To secure the future of the building and the preservation, protection and public appreciation of its heritage value and iconic status, one or more viable uses need to be identified. It is currently owned and managed by the Alexandra Palace Trust, in which the council has a stake, and as a little used and rarely profitable enterprise, is financially supported by the borough. Its iconic status and cultural significance present opportunities for a valuable cultural development that could enhance and protect its historic significance, reveal it to many more people and contribute to the prosperity of the borough. To that end, Haringey have begun preparing a masterplan to secure a more viable future for the palace.
- 11.4 The parkland around the building, Alexandra Park, covered in more detail in the Open Space section of the CS, is separately protected as it is on the National Register of Parks and Gardens of Historic Interest, one of two such places in the Borough, the other being Finsbury Park. The National Register of Parks and Gardens of Special Historic Interest is maintained by English Heritage, who have identified the park as being of special historic interest as grade II on their register. The grading of these sites is independent of the grading of any listed building which falls within the area. Haringey takes the status, heritage assets and condition of the park seriously, as one of only two nationally registered historic parks or gardens in the borough (the other being Finsbury park). Management Plans for the park consider carefully their impact on its historic significance and involve English Heritage, other national and local amenity and historic interest societies in decisions.
- 11.5 The whole of the park, including the palace, is included in the Alexandra Palace and Park Conservation Area; in fact they make up most of the Conservation Area. This affords both added protection from demolition (which would require Conservation Area Consent), loss of trees (they are automatically considered subject to a Tree Preservation Order) and insensitive alteration (which would require Planning Permission and Conservation Area Consent and be subject to our robust policies and national standards in PPS5 regarding development in Conservation Areas).
- 11.6 The whole of the park, including the palace, is also designated Metropolitan Open Land (MOL); therefore it is treated by PPS 3, the London Plan and our policies as equivalent to Green Belt. These robust policies, recently upheld in the Athlone House appeal for a

similar site in MOL, reinforce the point that no replacement of the palace nor any extension greater in scale or bulk to the existing/original building would be permitted.

- 11.7 Finally, the whole park, including the palace, is designated an Ecologically Valuable Site of Borough Importance (Grade 1). This protects the significance of the park as a habitat for wildlife.
- 11.8 Therefore it can be seen that the modest heritage significance of the palace and much greater significance of its environs, along with the Palace's greater iconic, visual and cultural significance, are extraordinarily well protected by Haringey.

## 12.0 Issue 7.12

*Are the monitoring indicators adequate (PPS5 Practice Guide)?*

- 12.1 This Policy requires Haringey to consider how they can best monitor the impact of policies and decisions on the historic environment. Particular attention needs to be focused on how heritage assets are at risk of loss or decay, and how they will change over time. Haringey needs to respond to this.
- 12.2 Haringey has identified 3 indicators;
- Progress the Conservation Area Appraisal programme,
  - Increase the number of buildings put forward for statutory listing,
  - Reduce the number of buildings, structures and Conservation Areas on the English Heritage "Heritage at Risk Register".
- 12.3 **Conservation Area Appraisals** - The Conservation Area Appraisal programme is a primary evidence base resource for Haringey's historic environment which needs to be progressed. The Practice Guide to PPS5 states that Conservation Areas will be designated if they are of special historic or architectural interest, the character and appearance of which it is desirable to preserve or enhance". As with other heritage assets, the "criteria have two components: the nature of the interest or significance that defines the designation and the relative importance of that interest or significance". The Conservation Area Appraisal is where those two components: nature of the interest and its significance, are to be set down.
- 12.4 Policy HE2 of PPS5, Evidence Base for Plan Making, sets out the importance to the government (via English Heritage) of all Local Authorities having access to a Historic Environment Records (HER). Conservation Area Appraisals should form the HER for Conservation Areas and should be used as part of the evidence base for other forms of plan making. At present 12 of the 29 Conservation Areas have Adopted Appraisals, including the whole of the Tottenham High Road Historic Corridor and many of the others in the east of the borough that are most under threat; these are all published online and available

in our offices. We also have a number of draft appraisals and we hope to publish and/or complete and adopt many more appraisals; possibly with assistance from local amenity societies.

- 12.5 **Listed and Locally Listed Buildings** - Nominations for statutory listing would follow from site inspections by Haringey officers, English heritage or any other interested party that reveal buildings of likely special historic and architectural merit. Assessments and designations are then made by English Heritage specialists.
- 12.6 Haringey is responsible for preparing its own Register of Locally Listed Buildings of Merit. PPS5 encourages these; although they do not automatically receive the same planning protection as those statutory listed, they are defined under PPS5 as an Undesignated Heritage Asset or if in a Conservation Area, a Designated Heritage Asset. The amount of information required varies but in either circumstance, such a designation is a material consideration in determining planning applications. It is hoped that there will be an updating of and consideration of further nominations for additions to Haringey's local list of buildings of architectural and historic merit, following our recent invitation to the public to submit nominations.
- 12.7 **The Heritage at Risk Register** - Progress by the Council on the reducing the entries in the Borough in the Heritage at Risk Register, which is produced by English Heritage, is an ongoing challenge in seeking to secure essential repairs to heritage assets at risk. Dialogue with uncooperative owners and legal processes can frequently take many years in protracted cases. This form of monitoring is recommended in the PPS5 Practice Guide as "an effective means of assessing whether protection policies are achieving success".
- 12.8 The current reality is that there are now more additions to the Heritage at Risk Register than in previous years, and the rate of getting assets off the Register is proving painfully slow i.e., in 2010/11 there were 3 Buildings at Risk Register additions against 1 Buildings at Risk Register removal. It is apparent that many owners are not properly maintaining or repairing their listed buildings. With the economic downturn the condition of many heritage assets is deteriorating and this is likely to continue during the coming years. Some listed buildings may become vacant and may need to be added to the Buildings at Risk Register. In the immediate future the situation is, regrettably, likely to get worse.

## Appendix

### Terms of Reference for the Haringey Design Panel

#### Introduction

Good urban design is essential to the creation of places that are economically, socially and environmentally successful and built to last. High quality urban design has been demonstrated to enhance inward investment, reduce crime, and deliver regeneration, new jobs, public safety, good housing and quality public spaces. As part of the drive to raise design quality in the Borough, the Council has set up the Haringey Design Panel

#### The Role of the Haringey Design Panel

- The function of a design panel is to give independent urban design advice on key development applications.
- The Panel does not have decision-making powers; rather it acts in an **advisory role**. However, in the event that its advice is not followed in any particular case, applicants and planning case officers will be expected to set out their reasons in their applications and reports.

#### How does the Panel operate?

- The Panel meets at maximum monthly intervals and look generally at **pre-application** submissions. This approach recognises that good design outcomes are the result of a detailed design process, which should take place outside of statutory period for determining planning applications.
- Panel members should observe principles of impartiality and confidentiality and excuse themselves from the meeting in the event of a conflict of interest, in accordance with CABE guidance.
- The Panel's comments are set out in writing for applicants and Development Management case officers approximately 2 weeks after a panel meeting.
- If and when a planning application is made, the report is published on the Council's planning application web page alongside all the consultation responses. and a Design Panel Comments paragraph, reporting the panels comments and any changes subsequently made, included in every planning officers' report to Committee or delegated powers. Planners may take into consideration an applicant's failure to incorporate the Panel's recommendations when determining the application.
- A Design Panel web page will be created shortly. Panel members advice will be sought whether to name the panel members here and publish panel reports.

#### Types of Applications Considered by the Design Panel

- Design Panel focuses on major applications and sensitive proposals. Major applications are defined as follows:
  - **Residential** : at least 10 units/sites over 0.5 hectare;
  - **Non –residential** : gross floorspace 1,000m<sup>2</sup> and over/sites over 1 hectare
- Sensitive proposals include development likely to have a significant impact on open space, the public realm, heritage, or the living and working environment of those within the area.

- Occasionally, other applications which, officers feel, will benefit from the expert design advice, are brought to the Panel's attention with the Chair's agreement.
- The Panel are also sometimes asked to comment on forthcoming Planning Policy documents and Masterplans.

### **Panel Membership**

#### **Chair**

- The Panel will be chaired by the Chief Planner (Assistant Director for Planning and Regeneration), Marc Dorfman, when he is available. In view of his extensive meeting commitments, it is recognised he is not available for every panel meeting. On these occasions the meeting will be chaired by the Facilitator (see below).
- The option of a Chair being selected from within the panel membership will be kept under consideration should the panel and Council agree.

#### **Size and Scope of the Panel**

- The Majority of Panel members would be practitioners but potentially academics and local residents, who are specialists in the areas of urban design, planning, architecture, landscape architecture and experts in the areas of sustainable design/construction methods and accessible buildings. A quorum of three members will be required for meetings.
- Some representation on the panel will also be sought from Conservation Area Advisory Committees (CAACs) and other relevant societies in Haringey. It is proposed that all Conservation Area Advisory Committees (CAACs) will be informed of panel meetings and invited to send a representative to observe where they do not have a panel member.
- The Council's Lead Member for Environment and Design Champion will also be kept informed of panel meetings and decisions welcome to attend as observers.
- Other Haringey officers may be asked or request to attend to provide expert advice and / or to be observers only, not otherwise participating in the discussion.
- The panel will be serviced a Facilitator from the Design and Conservation team, who arrange meeting dates, times, venues etc., liaise with panel members and those to present to the panel and produced and issue minutes / reports.

#### **Skills Composition of a Design Panel for Haringey**

<b>Skills/Area of Expertise</b>	
Urban Design	at least 3 or 4 experienced urban designers
Architecture	at least 3 or 4 members of the RIBA
Landscape	1 or 2 Landscape architects or RIBA members with landscape expertise (maybe included above)
Sustainable Design	1 or 2 Architects or building systems engineers (maybe included above)

Community	2 or 3 community representatives (from built environment and conservation groups, particularly CAACs)
Accessibility	Architect or other built environment professional with accessibility expertise (maybe included above)
Young people's interests	A student from a local school or college will be sought to join the Panel.

### **Monitoring**

The membership, success and operation of the Panel will be reviewed periodically, generally at the end of each year.

### **The Haringey Design Awards**

The panel members will be invited to participate in the Haringey Design Awards as advisors and/or judges; the awards to be held approximately every three years.