

From: Dave [dmorris@onetel.com]

Sent: 03 November 2011 13:43

To: LDF

Subject: National Planning Policy Framework - HFRA Comments on the Draft Policy Document

Attachments: HFRAplanningnationalpolicydraftresponse11.2011.doc

Haringey Federation of Residents Associations

www.haringeyresidents.org

c/o 7 Carrick Gardens, London N17 7AX Tel 0208 216 9651 info@haringeyresidents.org

3rd November 2011

To: Haringey LDF team - ldf@haringey.gov.uk

From: Dave Morris - Secretary, Haringey Federation of Residents Associations

Response as text below. As Word document attached.

National Planning Policy Framework HFRA Comments on the Draft Policy Document

Introduction:

The Haringey Federation of Residents Associations (HFRA) is the umbrella organisation for the 176 Residents Associations throughout Haringey. We are an inclusive Federation, involving Residents Associations based in areas of public and social housing, as well as RAs based in areas of mixed tenure and ownership. Hence we cover all areas of the borough, and a wide range of key issues relevant to local communities generally.

We have been particularly heavily engaged with planning and development matters, including being the main community organisation present throughout the Haringey UDP Inquiry in 2005 and Haringey LDF EiP in 2011. We have also taken part in the London Plan EiP in 2010, including being invited by the inspector there to lead on social infrastructure debates.

General Comments:

The draft policy purports to simplify planning legislation. Simplification is a laudable goal, but this policy proposal merely uses that as a cover for the wholesale destruction of the existing planning regime and the handing of control and direction of the planning process to property speculators and the construction industry, who have been complaining for years about the alleged expense and difficulty of existing planning controls but without providing any evidence in support of their claims. This document capitulates to their self-interest.

"Sustainable development" and "sustainable growth" are oxymorons, because development and growth are both predicated on the assumptions that resources are infinite and that social and environmental costs can be externalised and ignored -- assumptions which blatantly contradict the principles of sustainability.

The clearest indication of the policy's disregard of genuine sustainability is its "presumption in favour of development" and its removal of the national priority for brownfield development, which by default will encourage developers to consider building everywhere and anywhere in the two-thirds of England which lie outside national parks, green belts and areas of outstanding natural beauty. One inevitable consequence of this presumption will be a return to the unconstrained sprawl

which the 1947 Town and Country Planning Act was expressly framed to prevent, and a resumption of the 1980s-style hollowing out of town centres in favour of retail sheds on new ring roads -- meaning, inter alia, more car journeys, more fossil fuel imports, and more carbon emissions. Adding insult to injury, we find that a list of supposedly sustainable development includes airport access roads, motorway service stations and advertising hoardings. This is risible.

Another inevitable consequence of the presumption is the associated requirement that local authorities "approve all individual proposals wherever possible", which transparently suborns the local communities and local interests the draft policy pretends to champion. The document accepts in one breath that local electors may "resist development proposals that are not in line with their aspirations" -- or in other words, decide that conservation is more important -- yet in the very next breath instructs planning inspectors to concede every appeal from developers which local electors have rejected on the grounds that overriding national policy requires it. A more blatant abuse of democracy can scarcely be imagined...except, perhaps, the even more abusive assumption to be made where local authorities have no strategic plans at all, when the central authority will simply take planning approval as already having been given. Thus the government will simply impose its diktats wherever it wishes, confirming the fraudulence of its localism agenda.

The draft policy dismisses as simply irrelevant one of the core principles of planning, which is to safeguard the long-term public interest irrespective of short-term market forces. The long-term uses of land -- which is arguably the scarcest of all resources, since (short of the oceans drying up) there will never be any more of it -- should take precedence over the right to profit of its immediate (and inevitably temporary) owners. Instead, the draft policy requires local planning authorities to meet "objectively assessed needs" with "sufficient flexibility to respond to rapid shifts in demand" -- a dangerous confusion of "need" and "demand" which recurs throughout the document. This confusion of two unrelated terms is indicative of the quality of the document; it is therefore little wonder that the planning ministers called to support it in the media seem incapable of arguing consistently from one moment to the next.

The draft policy claims that the removal of existing planning controls will encourage the building of more houses, especially so-called 'affordable' houses (in reality only social housing is genuinely affordable to the millions of people most in need), but this ignores the fact that housing supply is a function of the economic cycle and the availability of mortgage finance and subsidies to housebuilders. The claim also ignores the fact that property developers currently have permissions for 330,000 as-yet-unbuilt houses, that 750,000 houses are currently long-term empty due to the inadequacies of property taxation, and that brownfield sites are estimated to have space for a further 3 million houses.

The claim also ignores the fact that 80% of current housing development applications are routinely approved by local authorities, with 80% of those rejected subsequently approved on appeal to the planning inspectorate -- or in other words, that 95% of all applications are approved. Any suggestion that existing planning controls are an impediment to the building of houses is therefore propaganda unsupported by any facts -- the real impediment is lack of money, which the government has exacerbated by cutting grants to housing associations for affordable housing by 60%, with the inevitable result that demand is falling and housebuilders are going out of business.

In sum, the draft policy is equivocal or vague on every point of quality, control, design, environmental value and heritage preservation. It is so obviously a ramp for property speculators and the construction industry, elevating the interests of business and "national economic policy" over conservation and local communities at every turn, that it is not fit for its claimed purposes.

The document should be withdrawn forthwith.

It should be replaced with planning proposals that address the real issues for local communities, society and the environment.

Planning issues in Haringey

Everyone now recognises that we must have environmentally and socially sustainable communities throughout Haringey, London and the UK. The current planning policies for local boroughs and London claim to agree - but is this only lip service?

We are facing extreme pressures from private and corporate developers and town planners leading to a range of concerns & problems, and pressure on an already inadequate social infrastructure (schools, health facilities, parks, play areas, public transport, local pubs and community centres and other facilities etc). Some policies supposedly meant to protect the interests of communities are being systematically flouted by developers, Councils & the GLA.

Faced with constant pressures for inappropriate or damaging development, residents want to ensure that we and future generations will live in strong and sustainable communities. To that end we have had to stand up for our interests.

Throughout London there are an ever-growing number of objections and campaigns over proposed local developments. Residents groups and associations are forming more and more alliances to resist what's wrong with major developments as well as smaller but equally important sites in local neighbourhoods. Many people are concerned to...

- * ***protect heritage and conservation features*** & the distinctive character of neighbourhoods
- * ***resist unwanted over-development*** imposed on communities
- * ***oppose over-intense housing development*** - densities have risen massively in the last few years, and there is a systemic failure by Councils and the GLA to enforce maximum density limits
- * ***support genuinely affordable housing*** – the vast majority of housing development is unaffordable to local people in need. A scandalously low 19% of new homes completed in 2006 in London were social housing (the only genuinely 'affordable' housing), despite housing need being used as 'justification' for otherwise unacceptable policies [See over for more comments regarding housing issues]
- * ***protect valued 'backlands' sites***
- * ***defend open green space from development***, especially undesignated sites
- * ***address the widespread deficiencies of green open space*** of all kinds
- * ***defend and expand children's play facilities*** in our neighbourhoods
- * ***oppose poor project design***
- * ***defend community facilities*** eg. healthcare sites, local shops, post offices, meeting places, community pubs. Publicly-owned land is continuing to be widely sold off for private development.
- * ***campaign against the sell off of ever more publicly-owned land***
- * ***halt the loss of affordable offices & sites*** for voluntary groups & small businesses
- * ***protect front gardens*** - concerns include the quality of street scene, pedestrian safety, flooding etc
- * ***resist environmentally unsustainable development*** – eg energy use, materials, design etc. A comprehensive low/zero-carbon energy programme (insulation, alternative energy generation, 100% recycling etc) is needed for every home, building and workplace throughout London
- * ***criticise increasing pollution*** - visual, air and noise
- * campaign against the ever more ***illegal advertising hoardings and billboards***
- * ***remove street clutter***
- * ***implement effective traffic calming***, 'living' streets & affordable public transport
- * ***call for greater (not less) resources for maintenance and improvement of public facilities, buildings & services***

Housing issues in Haringey

Housing issues are purported to be central to the proposed new national policy framework. However, the draft Framework completely fails to acknowledge or get to grips with most of the key issues. The following have been repeatedly identified as the key concerns in Haringey and around London.

Over-high housing densities – do they undermine the need to ensure sustainable communities? Current social and environmental infrastructure is inadequate to deal with the needs of current population levels, let alone greater/denser population levels. People are entitled to good quality living space and access to gardens etc. Do we really want to see a return to the failed tower blocks & estates of the past?

'Affordable' and social housing: the failure to reach even the very modest % targets from new housing completions. Most so-called 'affordable' housing is well out of the reach of the vast majority of those who need it, and should be radically redefined. Social housing is currently the only genuinely affordable, permanent housing and should be the majority of new builds (it is only around 1 in every 5).

Do S106 agreements lead to actual planning gains? Community facilities and amenities of all kinds essential to sustainable communities (eg open spaces, childrens' play areas, health, education, sports, leisure and meeting places, local shopping parades etc) are not only failing to be extended to address existing deficiencies, let alone the ever greater population pressures, but are under threat and being eroded on a daily basis in local neighbourhoods and town centres alike. No amount of S106 contributions can mitigate such real effects on the ground.

What can be done about the failure to ensure that new build housing contains enough family-sized housing, especially family-sized genuinely affordable and social housing? In Haringey the recommended mix for affordable housing developments is: 26% 3-bed, and 32% 4-bed. Yet of the total housing completions, eg in 2006/7, 94% were one and two bed units. Of the affordable housing completed in 2006-7 only 11% were 3 or 4 bedrooms.' The picture has not varied significantly since then.

How do we halt the spread of Houses In Multiple Occupation? Homes are being divided into ever smaller units, causing not only loss of much-needed family accommodation but also unacceptable over-crowding.

How do we ensure that all new housing, including all 'affordable' and social housing, is designed to conform to accepted, good quality standards – and to the positive character and heritage of neighbourhoods? This relates to the interior and exterior of every home, including impact on and contribution to the street scene.

How do we ensure that every substantial residential development contributes effectively to improving public open spaces and recreational facilities of all kinds? How do we protect smaller, informal green spaces?

How can we ensure that, in boroughs with serious land stress and competition, that all available land is earmarked for community needs - rather than for what developers can grab in order to make the most profit? Existing amenity land (eg for health services, education, and community facilities and services of all kinds) is being whittled away and sold off.

What can be done to respond to ever-increasing house prices, rents and insecurity? And could there be more effective action to prevent homes being left empty for long periods?

Bearing in mind the need for urgent and drastic cuts in carbon emissions to avoid dangerous climate change, what comprehensive policies and practices need to be imposed on all housing development eg regarding energy usage and generation, materials, design, space, greenery and green

space, recycling etc? Developers are rarely paying more than lip service to these critical issues. Policies need to be very carefully appraised and strengthened regarding environmental sustainability.

To summarise, it has been our experience that Haringey, London and UK planning policies, despite many good sentiments, are ineffective in protecting the interests of local communities. Reasons include:

- The *policies* themselves
- The *interpretation* of the policies
- ***Failure to ensure, commit to, and enforce, key policies which are supposed to protect community interests*** (eg social infrastructure, open space, affordable housing targets, housing density limits, heritage etc) when contrasted with other policies (eg general house-building and large scale development)
- ***Enforcement of conditions and agreements***
- ***The lack of a level playing field*** between local residents & well-resourced developers
- ***The reliance on S106 payments***, instead of actual planning gains
- ***Objectors denied their right to appeal***, unlike developers
- ***The need to listen to, genuinely consult, and empower communities*** instead of giving increasing power to the Mayor and central government

Specific Comments on the Draft National Policy Document

Paragraph 13: "The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. A positive planning system is essential because, without growth, a sustainable future cannot be achieved. Planning must operate to encourage growth and not act as an impediment. Therefore, significant weight should be placed on the need to support economic growth through the planning system." The statements in this paragraph contradict the heading of this section, "The presumption in favour of sustainable development", because continued growth is not sustainable; continued growth implicitly assumes that resources are infinite, which is physically impossible. Ergo, a presumption in favour of continued growth -- which is what this paragraph actually asserts -- has nothing whatever to do with sustainability.

Paragraph 14: "At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible." These two sentences manifestly contradict each other -- not all development proposals will be sustainable, or even recognise the principles of sustainability, and a requirement for local authorities to approve all proposals which come before them -- especially to "grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date", as required in the paragraph's third bullet point -- clearly trumps any pretence to sustainability. (I have already pointed out in my introduction this paragraph's illiterate confusion of "need" and "demand".)

Paragraph 17: "The application of the presumption will have implications for how communities engage in neighbourhood planning." This wording seems to assume that communities and neighbourhoods will support all new developments as a matter of course -- otherwise, why else impose on them the principles outlined in the three bullet points which follow this statement, which are expressly intended to nullify any concerns communities may have about the planning system?

Paragraph 19: The first bullet point's statement that "planning should be genuinely plan-led, with succinct Local Plans setting out a positive long-term vision for an area" contradicts the second bullet point's statement that "planning should proactively drive and support the development that this country needs". Local Plans, being local, plainly cannot address strategic national needs. The fifth

bullet point's statement that "planning policies and decisions should seek to protect and enhance environmental and heritage assets in a manner appropriate to their significance" is so vague as to its meaning and capable of so broad an interpretation that it is simply a gift to developers' lawyers and barristers. The seventh bullet point's wish that "planning policies and decisions should enable the reuse of existing resources, such as through the conversion of existing buildings" will only be achieved if the VAT payable on building conversions and restorations is reformed -- otherwise, it will continue to be cheaper and easier to demolish and build anew, and existing buildings will thus continue to be destroyed. This transparently has nothing whatever to do with sustainability.

Paragraph 20: "Development plans must aim to achieve the objective of sustainable development. To this end, they should be consistent with the objectives, principles and policies set out in this Framework, including the presumption in favour of sustainable development." The repeated reference to sustainable development in this short passage verges on the logorrhoeic, and in any case the argument is almost circular: sustainable development plans must comply with the NPPF because it is sustainable. This is more a collection of rhetorical statements than an argument, and indeed barely an argument at all.

Paragraph 26: "It will be open to local planning authorities to seek a certificate of conformity with the Framework." This is the sole mention in this document of a "certificate of conformity", for which no definition is offered. That being so, this statement is effectively meaningless.

Paragraph 39: "To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, local standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and on-site mitigation, provide acceptable returns to a willing land owner and willing developer to enable the development to be deliverable." Translated into plain English, this deliberately obfuscatory passage demands that local planning authorities refrain from establishing any minimum criteria for the quality of the design, materials used, cost and environmental value of new developments, or criteria for the development's integration with and suitability for the neighbourhoods or communities into which it is to be inserted. One could effectively make a mockery of the "anything goes" controls this NPPF introduces by submitting an application to construct a dwelling out of old fork-lift pallets and baler twine; the wording of this paragraph would require that it be rubber-stamped without further enquiry.

Paragraph 51: "When a neighbourhood plan is made, the policies it contains take precedence over existing policies in the Local Plan for that neighbourhood, where they are in conflict." This clearly conflicts with statements in paragraph 50.

Paragraph 52: "To pass the independent examination, the neighbourhood plan must ... be in general conformity with the strategic policies in the Local Plan." This openly conflicts with the principles set down in paragraph 51. The Local Plan and the neighbourhood plan cannot both have primacy; it must be one or the other.

Paragraph 53: "The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development." This (a) elides all development as sustainable development, by pretending that the prevention of development is in opposition to sustainability when in many cases it will not be (e.g. building a new housing estate in a river's flood plain), and (b) dismisses as irrelevant planning's core principle of safeguarding the public interest in the long-term uses of land against the short-term market-driven right to profit (i.e. to develop) of its current (and temporary) owners.

Paragraph 58: "The more issues considered at pre-application stage, the greater the benefits ... Consents relating to how a development is built or operated can be dealt with at a later stage." It has been shown time and again that if consents are not part of the pre-application process then they are difficult if not impossible to agree at a later stage because developers perceive them as being

imposed retrospectively, and thus argue against or even ignore them. The requirement must therefore be for consents to be considered as an integral part of any pre-application process.

Paragraph 64: "Local planning authorities should consider using Local Development Orders to relax planning controls for particular areas or categories of development, where the impacts would be acceptable, and in particular where this would boost enterprise and growth." Armies of lawyers could argue for months over what might constitute an acceptable impact, but in any case this statement clearly intends that "enterprise and growth" should be regarded as more important than anything else, including the supposedly sustainable development which this NPPF claims to promote -- so important, indeed, that what few planning controls the NPPF contains are to be set aside to allow business to dictate what gets built where, as long as what gets built satisfies their needs irrespective of what the community might want. There is no clearer confirmation anywhere else in this document of the fraudulence of the government's "localism" agenda.

Paragraph 66: "Community Right to Build Orders require the support of the local community through a referendum." However, this paragraph is silent on the costs of organising such referenda; it is highly likely that local authorities, with their own budgets under pressure, would refuse to meet such costs and would instead require that local communities do so. Since it is highly unlikely that communities would have the required organising funds available, the envisaged referenda would be a rarity, if indeed any were held at all.

Paragraphs 67 and 70: "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations" -- but "Local planning authorities should avoid unnecessary conditions or obligations, particularly when this would undermine the viability of development proposals." "Viability" in this context is presumably to be read as having the same meaning as in paragraph 39, meaning that no conditions or obligations should be imposed at all, however "unacceptable" the development, in case they get in the way of the drive for enterprise and growth fetishised in paragraph 64.

Paragraph 72: To help achieve sustainable economic growth, the Government's objectives are to promote the vitality and viability of town centres." The removal of the priority for brownfield development will undermine this objective.

Paragraph 85: "Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provisions of viable infrastructure necessary to support sustainable economic growth, including ... roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand." The oxymoronic nature of "sustainable economic growth" has already been addressed at paragraph 13, but the assertion that the provision of motorway service stations ("to support the safety and welfare of the road user") and airport access roads can in any way contribute to sustainability is simply ludicrous. Meeting travel demand irrespective of its impact on sustainability is to return to the "predict and provide" model of road-building which obtained until the 1980s, and which only generated more car journeys and thus increased traffic congestion.

Paragraph 88: "Planning policies and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable travel modes can be maximised." This statement, and the principles set out in paragraphs 89-92, openly contradicts the statements in paragraph 85.

Paragraph 99: "Local planning authorities should not question whether the service to be provided is needed nor seek to prevent competition between operators, but must determine applications on planning grounds." This (a) openly contradicts the statements in paragraph 96 that local authorities "should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum ... Existing masts, buildings and other structures should be used unless the need for a new site has been justified", and (b) will result in the continuation of the existing

practice of communications masts being erected wherever an operator wishes, irrespective of their visual impact. This is not planning control for the public benefit, but the absence of it.

Paragraph 109: The second bullet point requires local planning authorities to provide a "rolling supply" of sites "sufficient to provide five years worth of housing" plus "an additional allowance of at least 20 percent to ensure choice and competition in the market for land" -- a requirement which (a) is aimed at satisfying developers' demands for the acquisition of land for housebuilding, not the provision of homes themselves for people to live in, and (b) imposes on local authorities a duty to provide houses according to a national strategy which planning ministers have elsewhere claimed they wish to see abolished. (This is another strike against localism). In any case, the second bullet point is contradicted by the sixth and seventh bullet points, which require local planning authorities to "set out their own approach to housing density to reflect local circumstances" and "identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers". If the government was serious in its promotion of localism, these would be the first and second items in this bulleted list; that they are tacked onto the end of it speaks volumes.

Paragraph 110: "Planning permission should be granted where relevant policies are out of date, for example where a local authority cannot demonstrate an up-to-date five year supply of deliverable housing sites." This is another instruction from central government to build, build, build irrespective of local circumstances and the wishes of local communities.

Paragraphs 117 and 118: paragraph 117's statement that local planning authorities' "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout and access of new development" is buttressed by paragraph 118's statement that "Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative". In other words, local authorities are to allow developers to erect any piece of post-modernist tat anywhere they wish, even in the middle of a conservation area or a historic landscape, as long as it looks innovative and original. These two paragraphs all by themselves destroy every single statement in paragraphs 163 to 191 inclusive about the government's supposed commitment to the protection of the natural and historic environments.

Paragraph 123: "Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authorities detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety." This is an open invitation to advertisers to continue erecting hoardings wherever they wish and challenging local planning authorities to take what enforcement action they can (or more usually lack of enforcement), as is the case now. Few advertisement hoardings, once erected however illegally, will be removed -- as is the case now -- and their visual and physical intrusiveness and lack of aesthetic quality will remain unchallenged. The inclusion of this paragraph in a document which pretends to sustainability is quite farcical. The current restrictions on advertising should be increased and strengthened, not watered down.

Paragraphs 125 and 126: the first bullet point of paragraph 125 states that planning should promote "opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments" is buttressed by paragraph 126's statements (in its first and fourth bullet points) that planning policies and decisions should "plan positively for the provisions and integration of community facilities and other local services" and "ensure that housing is developed in suitable locations which offer a range of community facilities". These are statements of pious aspiration which are unlikely to be realised in practice, as is already the case -- if a developer wishing to construct a gated community or other inappropriate development offers a large payment under section 106, a cash-strapped local authority is more likely to take the money and ignore these instructions.

Paragraph 127: this states that planning authorities should "take a proactive, positive and collaborative approach to the development of schools", "attach very significant weight to the desirability of establishing new schools and to enabling local people to do so", and "only refuse planning permission for a new school if the adverse planning impacts on the local area outweigh the desirability of establishing a school in that area". This hands-off, free-for-all approach could lead to the establishment of innumerable competing schools in the same area, without any attempt to first establish whether there is an actual need to be met and whether the proposed location and design is suitable.

Paragraph 129: "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless ... the need for and benefits of the development clearly outweigh the loss." This is dangerous threat to the country's green spaces and is totally unacceptable. As with the statements of pious aspiration at paragraphs 125 and 126, the offer of a large payment to a cash-strapped local authority under section 106 could easily be taken as a benefit which outweighs the loss. The protection of all green spaces must be strengthened, not put under threat.

Paragraphs 130 and 131: paragraph 130's statement that "By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances" is contradicted by paragraph 131's statement that "Local Green Space designation will not be appropriate for most green areas or open space". The caveats in the four bullet points which follow paragraph 131's statement would in practice make it next to impossible to designate anywhere as a Local Green Space.

Paragraphs 163 to 191 inclusive: every single statement of positive intent in these paragraphs is destroyed by the statements in paragraphs 117 and 118 that developers should be allowed to build what they like where they like as long as it looks innovative and original. But even within these paragraphs, there are inconsistencies, derogations and caveats which undermine what protection these paragraphs claim to deliver. Paragraph 164 states that "the planning system should aim to conserve and enhance the natural and local environment", but the fourth bullet point of paragraph 167 states that only the landscape and scenic beauty of the National Parks, the Broads and Areas of Outstanding Natural Beauty should be given "great weight": a statement which the sentence immediately following undermines by excluding Areas of Outstanding Natural Beauty from the "important consideration" of wildlife conservation and cultural heritage. Paragraph 176 states that "the historic environment and its heritage assets should be conserved and enjoyed", but paragraph 184 then allows the destruction of historic assets if this will result in "substantial public benefits" which "outweigh" that loss -- wording so loose that it is simply a gift to the developers' lawyers. Paragraph 186 states that local authorities "should not permit the loss of whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred" -- wording which would presumably allow developers to demolish historic buildings provided they withhold their application until the demolition has been completed, and which would merely ensure the continuation of the present situation whereby developers purchase heritage buildings and allow them to decay to the point where they have to be demolished because they have become unsafe. That is not protection; it is a licence for destruction. It is offensive and unacceptable.

Final point - Third party appeals

Local communities should clearly have the right to a third party' appeal against a decision of a planning committee. Currently only applicants can appeal. In opposition both the Conservatives and the Liberal Democrats promised to give communities this right of appeal against planning decisions. This promise must be honoured.

Dave Morris
Secretary, Haringey Federation of Residents Associations
3.11.2011

With thanks to Joseph Nicholas of the Tottenham Civic Society for his draft, much of which we have adopted.

-

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>
