

# **HIGHGATE NEIGHBOURHOOD PLAN: STRATEGIC ENVIRONMENTAL ASSESSMENT**

**Addendum considering Examiner's Proposed Modifications**

**Prepared by Camden Council and Haringey Council**

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# 1 Background

- 1.1 In September 2016 the Highgate Neighbourhood Forum ('the Forum') submitted the draft Highgate Neighbourhood Plan ('the Plan') and supporting documents to Camden and Haringey Borough Councils. These documents were then publicised by the Councils for a public consultation running 6-weeks. A Strategic Environmental Assessment (SEA) report was included as one of the supporting documents.
- 1.2 Following the consultation Camden and Haringey Councils, in collaboration with the Forum, appointed an independent examiner to conduct an examination of the draft Neighbourhood Plan.
- 1.3 The Councils received the Examiner's Report on 28<sup>th</sup> February 2017. The report recommended that the Highgate Neighbourhood Plan proceed to referendum subject to a number of proposed modifications. These modifications are considered necessary to ensure the Plan meets the 'basic conditions' as prescribed by legislation.
- 1.4 The Examiner's proposed modifications have not previously been assessed through the Strategic Environmental Assessment process and therefore need to be appropriately considered. The modifications are the focus of this SEA Report Addendum, discussed in further detail below.
- 1.5 This SEA Report Addendum has been prepared jointly by Camden and Haringey Councils to help inform future decisions in respect of the plan process.

## 2 This SEA Report Addendum

- 2.1 The Highgate Neighbourhood Plan is being developed alongside an iterative process of Strategic Environmental Assessment. SEA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of environmental (and wider sustainability) issues, with a view to avoiding and mitigating adverse effects and maximising the positives.
- 2.2 Neighbourhood Plans must contribute to the achievement of sustainable development. However SEA is not an automatic requirement for all such plans. Rather SEA is a requirement where an initial 'screening' assessment identifies the potential for significant environmental effects.
- 2.3 Camden and Haringey Councils prepared an SEA screening opinion on a 'pre-submission' version of the Neighbourhood Plan in March 2015 for consultation with statutory consultees (Environment Agency, Historic England and Natural England). Taking account of feedback received, the Councils produced a final SEA screening opinion report in July 2015. The report concluded that the Plan was likely to have significant environmental effects and should therefore be subject to SEA.
- 2.4 Accordingly, SEA has been undertaken throughout the plan production process with reports published at various stages. This includes the SEA Scoping Report (September 2015), SEA Environmental Report (December 2015) and SEA Environmental Report Update (August 2016).
- 2.5 This report is an Addendum to the SEA Environmental Report Update (2016), which was presented alongside the 'publication' (Regulation 16) version of the Neighbourhood Plan. The Addendum is considered necessary to ensure the Examiner's proposed modifications are appropriately considered for their potential environmental effects. It also provides that the Plan, as proposed to be modified, will be subject to the iterative process of SEA demonstrated to-date. This Addendum should be read alongside previous SEA Reports, as relevant.
- 2.6 The aim of this Addendum is to present information on the proposed modifications with a view to informing considerations at subsequent stages in the plan process, including the decision statement and referendum stages. Specifically, this report seeks to screen the modifications to consider whether any further environmental or other sustainability issues or implications are likely to arise from these.
- 2.7 As an addendum this report is concerned principally with presenting an appraisal of the proposed modifications, rather than the draft Neighbourhood Plan as a whole. However, consideration is given to the cumulative effects of the modifications in terms of their overall influence across the entirety of the plan, where appropriate.

### 3 Assessment Methodology

3.1 The scope of the Strategic Environmental Assessment (i.e. the sustainability issues and objectives that should be a focus of the appraisal) and methodology for carrying out the assessment has been established through previous SEA reporting on the Neighbourhood Plan. Accordingly, this Addendum continues to apply the SEA Framework established therein. Whilst further details on scoping are available in previous reports, an overview of the SEA framework is set out in Table 1 below.

#### Screening

3.2 The first step in the assessment of the proposed modifications is screening. This involves consideration of whether the modifications will substantively affect the policy approach or impact significantly on the strategic sustainability objectives.

3.3 A precautionary approach to screening is taken here. This ensures that any uncertainty as to whether a modification could lead to new or different significant environmental effects is appropriately addressed. Modifications are ‘screened in’ for further assessment where there is such uncertainty.

Air quality	1. Promote measures to reduce air pollution. 2. Promote sustainable transport use and reduce the need to travel.
Biodiversity	3. Protect, and where possible enhance, all biodiversity and geological features.
Climate change	4. Promote climate change mitigation in Highgate. 5. Support the resilience of Highgate to the potential effects of climate change.
Economy & Enterprise	6. Support and maintain a strong and sustainable community
Health & well-being	7. Promote the health and well-being amongst local residents
Historic environment & landscape	8. Protect, maintain and enhance Highgate’s cultural heritage resources, including its historic environment and archaeological assets.  9. Protect and enhance the character and quality of landscapes / townscapes
Population, housing & community	10. Provide a range of types of housing including affordable housing, and a mix of dwelling sizes, types and tenures. 11. Cater for existing and future residents’ needs as well as the needs of different groups of the community (e.g. younger persons)
Transport	12. Promote sustainable transport use and reduce the need to travel, especially using private cars.

3.4 The screening exercise is set against the following screening categories:

Table 1: SEA Framework	
SEA Topic	SEA Objectives

**Screen 1 (S1)** - Technical clarification (e.g. factual update, grammatical/spelling correction, updates to signposted policies or documents, such as planning consents, legislation/policy, etc.), contextual amendments (e.g. changes to text within introductory sections which set the context for subsequent policies), or consequential changes (e.g. amended policy title or reference).

**Screen 2 (S2)** - Procedural clarification/change (e.g. amended supporting text on how a policy would be implemented, where the policy wording itself is not changed by the modification).

**Screen 3 (S3)** - Change to policy wording that would not alter how a policy would be expected to be interpreted and/or implemented (e.g. changes to policy wording and/or the supporting text to improve legibility).

- 3.5 Where one of these 3 screening criteria applies, modifications have been ‘screened out’ from further detailed SEA consideration. This is on the basis that the modifications are unlikely to have potential significant effects and/or are unlikely to have implications for the (baseline) appraisal of the Plan as set out in the SEA Environmental Report Update (2016).
- 3.6 Where a modification has not been ‘screened out’ then it has been subject to further assessment (i.e. ‘screened in’) having regard to the SEA Framework discussed above.
- 3.7 Outcomes of the screening and iterative assessment process are set out in **Appendix A**. A high level summary of findings is also set out in the next section of this report.

- 3.8 The assessment below relates to the Examiner’s proposed modifications and there is no discussion of ‘reasonable alternatives’ to the preferred approaches taken therein, unlike in previous reports. Where particular policy issues have been addressed through the modifications, it is appropriate that these are not subject to formal ‘alternatives appraisal’ through the SEA process, given that these have been considered and established through the public examination process and are necessary to make the Plan meet the basic conditions.

## 4 Summary

- 4.1 The following section summarises key findings of the Strategic Environmental Assessment screening of the Examiner’s proposed modifications to the Highgate Neighbourhood Plan.
- 4.2 The Examiner put forth 29 proposed modifications, considered necessary to ensure the Plan meets the basic conditions. However the number of individual modifications was far greater. This is because many of the 29 modifications comprised multiple changes to the policies and sub-criteria. This SEA addendum has considered the full suite of modifications.

- 4.3 It is important to note that neither the quantum of growth planned for the Neighbourhood Area over the plan period, nor the spatial distribution of this growth, has changed as a result of the modifications. This SEA Addendum is therefore set in the context of the same overall strategic framework that was set out and considered at the Regulation 16 'publication' stage.
- 4.4 Many of the proposed modifications were 'screened out' from further Strategic Environmental Assessment consideration. For the most part, this was owing to the modifications consisting of changes to policy wording, or procedural/technical clarifications within the supporting text, which did not substantively alter the overall policy principles or corresponding implementation points.
- 4.5 Where modifications were 'screened in' it was often the case that policy changes were assessed as having positive effects on selected SEA objectives, but not so much as to impact significantly or change the overall conclusions of the baseline assessment, i.e. the SEA Environmental Report Update (2016).
- 4.6 There were a few modifications which resulted in notable changes on the baseline assessment including:
- Modification reference PM2, which proposed the inclusion of a new policy on Community Infrastructure Levy, was considered to result in newly assessed significant positive effects for the Plan. However the specific effects on SEA objectives will ultimately be dependent on any confirmed funding dedicated to delivery of projects on the priority CIL spending list;
  - Modification reference PM7, relevant to Aylmer Road Parade, which proposed the introduction of a threshold approach for managing town centre uses and stronger protection for employment land and floorspace, was considered to have more positive effects than previously assessed, particularly on SEA objective 6; and
  - Modification reference PM15, which set out changes to the extent of proposed Local Green Space (LGS) designations. The modification reduces the number of proposed LGS but the remaining 9 LGS are still considered to continue to have significant positive effects across the SEA objectives, as previously appraised. However the assessment has been updated to reflect the likely impacts resulting from the removal of 2 proposed LGS.

4.7 The iterative assessment process has demonstrated that the modifications do not significantly impact on the overall assessment of the Plan, or trigger the need for new mitigation measures to manage effects. Furthermore, the modifications are not expected to result in any significant negative effects on the SEA objectives.

## 5 Appendix A: Assessment

Proposed modification number (PM)	Page no./ other reference	Proposed Modification	Screening / Assessment
PM1	Pages 21 - 22	<p>Policy SC1: Highgate’s Housing Needs New opening sentence: <u>The Neighbourhood Plan will help to facilitate delivery of a minimum of 300 net additional housing units in Highgate up to 2026.</u> Planning applications will .....</p> <p>Policy SC1 amend to read:</p> <p><u>1.Affordable housing that meets the Boroughs’ targets and is delivered on-site;</u></p> <p><del>2.Efficient</del> <u>Optimise the use of land ....</u></p> <p>3. Inclusion of smaller units <u>to provide for a mix of house sizes and to allow older..... to provide ‘starter homes’ for younger people affordable housing products aimed at first time buyers;</u></p>	<p>The modification reinforces that the Plan will support delivery of the Borough’s strategic housing requirement. This is likely to reinforce the assessed positive effects, particularly on SEA objectives 10 and 11.</p> <p>S1/S2. The modification reflects the Councils’ position that affordable housing should be delivered on-site. This is likely to reinforce positive effects of the baseline assessment, particularly SEA objectives 10 and 11.</p> <p>The terminology change provides a more comprehensive approach for delivering sustainable development. This is likely to have positive effects although not so much as to impact on the baseline assessment overall.</p> <p>S2/S3</p>

		<p>4.These may include .... custom build <u>where there is a demonstrable need.</u></p> <p>Supporting text –</p> <p>(i)add a new second sentence as follows:</p> <p>.... needs and budgets. <u>Haringey’s Local Plan seeks to deliver a minimum of 300 net additional housing units in Highgate to 2026, which the Neighbourhood Plan supports and will help to facilitate.</u></p> <p>While the demand for affordable ....</p> <p>(ii)add a new sentence between first and second paragraphs:</p> <p><u>On-site provision of affordable housing will be sought given the under-provision locally, and where off-site provision is to be provided, proposals should seek to deliver this in Highgate where possible.</u></p> <p>(iii)modify paragraph 4 as follows:</p> <p>It will supplement .... the level of older person <del>and ‘starter homes’</del> <u>housing</u> required by the London Plan.... Specialist forms of housing are encouraged to meet identified local need <u>and in line with higher level policies,</u> the loss of housing will be resisted unless replaced <u>at existing or higher densities</u> with at least equivalent floorspace and meets/<u>to</u> meet local housing need.</p> <p>(iv)after paragraph 4 add:</p> <p><u>For the respective Local Plans, the Councils have made arrangements for the gathering of evidence of need for self-build housing.</u></p>	<p>S3</p> <p>S2</p> <p>S2</p> <p>S2</p> <p>S1</p>
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PM2	Page 23	<p>Amend first sentence of 3<sup>rd</sup> paragraph:</p> <p>In line with paragraph 69 of the NPPF, it is vital that <del>all new</del> development in the Plan area ...</p> <p>New <u>Policy SCX: Community Facilities</u> at top of Page 23</p> <p><u>The Highgate Neighbourhood Forum’s recommended priorities for Community Infrastructure Levy (CIL) are listed as follows (in order of popularity in poll during Consultation):</u></p> <ul style="list-style-type: none"> <li>• <u>Feasibility for shuttle buses linking local communities</u></li> <li>• <u>Enhancing Pond Square</u></li> <li>• <u>Supporting Waterlow Park</u></li> <li>• <u>Highgate Bowl Project</u></li> <li>• <u>Community space at 271 terminus</u></li> <li>• <u>Trees on North Hill / Archway Road</u></li> <li>• <u>Facility for young people</u></li> <li>• <u>Dedicated safe cycleways</u></li> <li>• <u>Creating green pockets and corridors</u></li> <li>• <u>Crossings on Archway Road /Wellington etc</u></li> <li>• <u>Playgrounds at Hillcrest and Parkland Walk</u></li> </ul>	<p>The modification helps to clarify when development will be expected to support infrastructure, in line with national policy and legislation. The change is not considered to impact on the baseline assessment.</p> <p>S1</p> <p>The modification provides greater certainty regarding the use of CIL funding. There are likely significant positive effects across a number of SEA objectives. However the objectives impacted will depend on the specific project(s) supported by CIL funding.</p>
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		<ul style="list-style-type: none"> <li>• <u>Safe cycling learning space</u></li> <li>• <u>Solar panel and wind turbine schemes</u></li> <li>• <u>Enabling guerrilla gardening</u></li> <li>• <u>Green walkways</u></li> <li>• <u>Support for Holly Lodge Community Centre</u></li> <li>• <u>Signage from stations to Cemetery, Village etc</u></li> <li>• <u>Make Highgate Station cycle/disabled /pedestrian friendly</u></li> <li>• <u>Grants for improved shopfronts</u></li> <li>• <u>Old Highgate overground station project.</u></li> </ul> <p><u>This CIL priority list may be subject to periodic review and updating over the life of the Plan.</u></p> <p>Add supporting text immediately below the new policy:</p> <p><u>The Forum asked the community how the local proportion of CIL should be spent as part of the consultation for the draft Plan. (ie. <a href="http://www.highgateneighbourhoodforum.org.uk/plan/cil-list/">http://www.highgateneighbourhoodforum.org.uk/plan/cil-list/</a>) (Dec 2015), and an earlier list was consulted on in 2014).</u></p>	<p>S1</p> <p>S1</p>
PM3	Page 23	<p>Policy SC2: Allotments and communal garden land.</p> <p>I.The loss of allotments .... <del>wherever possible.</del></p> <p>II.The provision of <u>communal outdoor open space for residents, potentially including areas for additional self-managed allotments or garden land..... wherever possible and viable. Where such open space</u></p>	<p>S3</p> <p>The modifications help to ensure that requirements on open space provision are more effective and deliverable. This is likely to result in positive effects,</p>

		<u>provision is delivered, it should be positively managed.</u>	particularly on SEA objectives 3, 7 and 11.
PM4	Page 25	Extend 3 <sup>rd</sup> paragraph of supporting text:  .... over the plan period. <u>The provision of additional floorspace for business purposes to meet the anticipated growth in employment will be viewed favourably, especially where proposals would complement the policies for existing commercial core areas and allocations for Key Sites.</u>	S2. Whilst the modification does not change the policy is strengthens the Plan's support for employment development and is therefore likely to reinforce assessed positive effects on SEA objective 6.
PM5	Page 28	Policy EA1: Highgate Village Core  Delete criterion III and replace with a new <u>Policy EAX: Loss or Change of Use of business premises from Highgate Village Core</u>  Any application proposing a loss or change of use of A or B class premises <del>is assessed for its potential</del> <u>must not result in an unacceptable impact on the vitality and viability of, and employment opportunities within, the shopping area.</u>	S1  The modification brings EA1 in line with higher level policies but the amendments are not considered to impact on the main thrust of the policy objectives. Therefore the change is not considered to impact on the baseline assessment.
PM6	Page 28	Policy EA1 – second sentence:  <del>As a general guideline,</del> The non-A class use ...	S3
PM7	Page 31	Policy EA3: Aylmer Parade  <u>Aylmer Road Parade comprises the designated Local Shopping</u>	S1

		<p><u>Centre at Aylmer Road and Cherry Tree Hill and the non-designated employment land and buildings to the rear.</u></p> <p><u>I. Within the Local Shopping Centre, proposals for retail (Class A1 uses) will be supported. The use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use will not exceed 50% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre.</u></p> <p><del>† II. Retail (Class A1) and Employment floorspace including small office and workshop ... will be retained for employment use unless they can be shown to be no longer commercially viable ... that the property has been actively suitably marketed for an appropriate period, in line with higher level policies. 12 months on realistic terms.</del></p> <p><del>‡ III. The provision of new small office, workshop and retail units (100 sqm or less) of this type within ....</del></p> <p><del>‡‡ IV. Any application proposing .... premises is assessed for its potential must not result in an unacceptable impact on the vitality and viability of, and employment..</del></p>	<p>The modification brings EA1 in line with higher level policies and through the introduction of specific thresholds, sets a more effective basis against which to assess proposals. This is likely to result in significant positive effects on SEA objective 6.</p> <p>The modification brings EA3 in line with higher level policies, which set a more rigorous approach to the protection of employment land and floorspace. This is likely to result in positive effects on SEA objective 6.</p> <p>S1</p> <p>The modification brings EA3 in line with higher level policies but the amendments are not considered to impact on the main thrust of the policy objectives. Therefore the change is not considered to impact on the baseline assessment.</p>
PM8	Page 37	<p>Policy TR1: Promoting Sustainable Movement</p> <p>New development should promote walking, cycling and public transport use. <del>Major</del> commercial, service based and residential (<del>more than ten units</del>) development should make suitable provision, <del>where appropriate,</del></p>	<p>The modification amends the threshold set to reflect the definitions of major development for residential and commercial uses set out in higher level policy and legislation. As TR1 continues to</p>

		<p>for pedestrians, cyclists and access to public transport. <u>Where justified by a site's location and the character of the proposed development, and where the delivery of an otherwise sustainable development would not be threatened, smaller developments may also be expected to make provision for better pedestrian, cyclist or public transport access.</u> Provision may include:.....</p> <p>Footnote to TR1: <u>Major development is defined as residential development of 10 or more units, and commercial development of at least 1,000 sqm or a site area of at least 1 hectare.</u></p> <p>Second paragraph of supporting text:</p> <p><del>Large</del> <u>Major</u> residential and material changes to schools, medical facilities and other non-residential developments <del>will be required to</del> <u>should</u> take account of their impact on the community <del>in a way that they have not done in the past. On site and off site, all new developments will be required to contribute</del> <u>Planning obligations will be secured, where it is legitimate to do so and subject to viability, viable to enhance</u> the connectivity of the Plan area through <u>measures including</u> the provision of new and improved cycle links ...</p>	<p>provide scope for consideration of smaller (i.e. minor) development where appropriate, the change is not considered to impact significantly on the baseline assessment, which provides for minor positive effects on the SEA objectives.</p> <p>S1. As above.</p> <p>S1</p> <p>S3. The modification ensures that the policy reflects the legal tests for planning obligations whilst retaining the main thrust of the policy intent.</p>
PM9	Page 38	<p>Policy TR2: Movement of Heavy Goods <u>Vehicles</u></p> <p>I. Have a construction management plan (CMP)...logistics of heavy good vehicle movements – this will be required for any <del>significant</del> <u>major</u> development. For smaller developments, the Councils will consider the requirement for a CMP or SMP, having regard for access issues, and the potential impact on the local road network, <u>and impact on properties in the vicinity of the development site.</u> It will be designed to keep disruption to a minimum. <u>These CMPs and SMPs will be secured through</u> a condition attached to the permission <u>or</u></p>	<p>S1/S3. The modification brings the policy in line with the definitions of major development set out in higher level policy and legislation.</p> <p>S3</p> <p>S3</p>

		<p>through a section 106 planning obligation, and must be agreed with the council prior to the commencement of works;</p> <p>New sentence at beginning of supporting text:</p> <p><u>Delivery and servicing plans are the same as servicing management plans (SMPs).</u></p> <p>New sentence at end of second paragraph of supporting text:</p> <p><u>Camden Planning Guidance 7, paragraphs 8.8-8.10 provides guidance on CMPs.</u></p>	<p>S1</p> <p>S1</p>
PM10	Page 39	<p>Policy TR3: Minimising the Impact of Traffic Arising from New Development</p> <p><i>Delete existing policy and replace with:</i></p> <p><u>New major development, or smallscale development likely to generate significant additional traffic movements and demand for parking, will be expected to demonstrate the following:</u></p> <p><u>I. That a transport assessment has been carried out, or a transport statement prepared, to quantify future vehicle movements to, from and within the site including links to existing transport networks. Appropriate connections to highways and street spaces should then be put forward to serve the development;</u></p> <p><u>II. Proposals should provide information on planned parking arrangements to demonstrate that there would be no detrimental loss of on-street parking or harmful impact from additional parking on the surrounding area and transport network;</u></p> <p><u>III. Developments requiring pick-up, drop off, or waiting areas, should put</u></p>	<p>The full suite of modifications bring the policy in line with the definitions of major development set out in higher level policy and legislation, and also provide scope for consideration of smaller (i.e. minor) development. In addition, the modifications help clarify the requirements to set a more effective policy framework. This is likely to have a positive impact on SEA objective 12.</p> <p>As above.</p> <p>As above.</p>

		<p><u>forward appropriate arrangements within the site where possible which will ensure safety and minimise congestion; and</u></p> <p><u>IV. The development should protect and exploit opportunities for the use of sustainable transport modes for the movement of people and goods. In order to minimise traffic movements and parking demand and any associated harmful impacts, travel plans should be prepared and implemented in accordance with guidance from Transport for London and the Boroughs of Haringey and Camden.</u></p> <p>New sentence in supporting text between the two paragraphs on Page 39:</p> <p><u>Appendix 2 describes the traffic and parking issues faced by residents and others in Highgate. Further information on transport assessment and parking is available in Transport for London’s Best Practice Guidance.</u></p>	<p>As above.</p> <p>S1</p>
PM11	Pages 40 & 41	<p>Policy TR4: Reducing the negative impact of parking in Highgate</p> <p><del>VI.</del> Create, or add to, an area of car parking that <del>harms-would</del> <u>have an adverse impact on local character or a building’s setting ....</u></p> <p><del>VII.</del> Any new off-street parking <del>will additionally</del> <u>should have regard for its impact on the character of the local area, and could be required to preserve or re-provide any means of enclosure.....</u></p> <p><del>VIII.</del> Provide....increases in surface <u>water</u> run-off.</p> <p>Amend third paragraph on Page 41:</p> <p>(Camden already has policies in their Development Policies Plan (DP18 and DP19) that seek to manage parking in such</p>	<p>S3</p> <p>S3</p> <p>S1</p>

		<p>areas, as does Haringey in <del>DM43</del> saved Policy M9 of the UDP). Camden Council is seeking car free development throughout the Borough regardless of PTAL ratings, through Policy T2 of the emerging Camden Local Plan. Haringey's Policy DM32 in its emerging Local Plan will only support car-free development where PTAL is 4 or higher and within a CPZ. When these Plans have been adopted, the strategic policy framework should provide greater certainty for Highgate, and the Neighbourhood Forum may need to review its policy. Other than in exceptional ....</p>	S1/S3
PM12	Page 42	<p>Policy TR5: Dropped kerbs and cross-overs</p> <p>Where planning permission is required, planning applications for .....areas covered by a CPZ <u>where this would adversely reduce on-street parking capacity within the CPZ.</u></p>	The modification provides a more flexible approach for considering the impact of proposals whilst retaining the main thrust of the policy objectives. Therefore the change is not considered to impact on the baseline SEA.
PM13	Page 46	<p>Major open spaces</p> <p>Multifunctional areas of outstanding importance in local, regional or national terms,<del>to include but not limited to,</del> <u>These are Hampstead Heath ....</u></p> <p>Policy OS1: <del>Vistas from and to</del> Highgate's Major Open Spaces</p> <p><del>Any new d-Development which is visible from adjacent to Highgate's....intrusive. New d-Development visible from adjacent to Highgate's .....</del></p>	<p>S1</p> <p>S1</p> <p>Whilst the modification limits the scope of the policy (applying to sites adjacent to rather than visible from open spaces) OS1 continues to give protection to local</p>

		<p style="text-align: center;">Delete criterion I.</p>	<p>character and open spaces. Therefore the change is not considered to impact significantly on the baseline assessment.</p> <p>The modification removes the requirement pertaining to vistas from and to open spaces. Whilst the modification limits the scope of the policy, OS1 continues to give protection to local character and open spaces. Therefore the change is not considered to impact significantly on the baseline assessment.</p>
PM14	Page 47	<p>Policy OS2: Protection of Trees and Mature Vegetation</p> <p>I. Within the conservation areas..... should be retained <u>where possible</u>. If such loss is shown to be absolutely necessary, <del>developers and others</del> <u>new development</u> will be expected to provide suitable replacements <del>ie- with</del> like for like <u>replacement being supported where appropriate and feasible</u>.</p> <p>II. Developments will .... and <del>vistas to</del> <u>the setting of</u> the major open spaces.....</p> <p>III. Within the conservation areas or when protected by a TPO, <del>specimen veteran and mature trees .....</del> <u>ie. like for like</u> if a mature tree is found to be diseased ..... and requires <u>extensive works which would reduce the crown by so much that it would impact severely on its significantly reducing its ecological or amenity value, then a similar broadleaved</u></p>	<p>S3</p> <p>S1</p> <p>S3</p> <p>As per comments above re: (PM13) OS1.I</p> <p>S3. The modifications retain the main intent of the policy on tree management. Therefore the change is not considered to significantly impact on the baseline assessment.</p>

		<p>replacement (in terms of mature height and/or canopy) should be replanted <u>appropriate replacement planting will be sought</u> as close to the original site of the tree as possible. <u>Veteran trees should be retained where possible.</u>"</p>	
PM15	Pages 48-50	<p>Policy OS3: Local Green Space</p> <p><del>LGSD2 Hillcrest Open Land</del></p> <p><del>LGSD7 Aylmer Road Open Space</del></p>	<p>The modification reduces the number proposed Local Green Spaces. Overall the designation of the remaining 9 LGS is likely to continue to have significant positive effects across many of the SEA objectives as set out in the baseline assessment.</p> <p>The removal of proposed LGSD2 ensures conformity with the Local Plan and supports delivery of the strategic housing requirement, which is likely to have a positive effect on SEA objective 10. Whilst the modification removes LGS status for the open space at Hillcrest, it is noted that the Local Plan requires that new proposals at this site to deliver appropriate amenity space and re-provide play areas if lost. This should generally result in neutral or positive effects, consistent with SA findings of the Local Plan, however the effects on other SEA objectives are likely to be clearer once any detailed redevelopment proposals are set out. The modifications also provide for the removal of proposed</p>

		Figure 10 Local Green Space Allocations should be amended accordingly.	LGSD7. The site is operational land for a strategic infrastructure provider in the Borough and it is noted that the Examiner concluded there was insufficient evidence that the site is demonstrably special to the local community. The modification is therefore considered to have a neutral effect.  S1
PM16	Page 51	<p>Policy OS4: Biodiversity and <del>Ecological Corridors</del> <u>Highgate's Green Grid</u></p> <p>Development should <del>not harm or reduce</del> <u>support</u> the ability of <del>'ecological corridors'</del> <u>'Highgate's Green Grid'</u> (detailed in Appendix 3 <del>on website</del>) to act as an element in the local ecological network. <del>Unless the need for, and benefits of, the development in that location clearly outweigh the loss.</del> <u>The impact of a proposal on the Green Grid will be assessed against its wider benefits to the local area.</u></p> <p>Move the second sentence of the policy "Any development which triggers..." to the beginning of the second paragraph in the supporting text.</p>	<p>S1</p> <p>The modifications set a more positive framework for delivering sustainable development, consistent with higher level policies, whilst retaining the main intent of the policy. Therefore the change is not considered to significantly impact on the baseline assessment.</p> <p>S2</p>
PM17	Page 53	Figure 11: The <u>Highgate Conservation Area (LB Camden)</u> and the <u>Highgate Conservation Area (LB Haringey)</u> and Holly Lodge Conservation Areas	S1
PM18	Page 56	Policy DH3: Rear Extensions	The modification provides more flexibility

		Amend last sentence: Development should respect and preserve existing architectural features <u>where these contribute to local character and appearance,</u> for example ...	to support sustainable development, consistent with higher level policies, but does not change the main intent of the policy. Therefore the modification is not considered to impact on the baseline assessment.
PM19	Page 57	<p>Policy DH5: Roofs and Roofscape</p> <p>Roof extensions, <del>or</del> dormers <u>and rooflights</u> should respect ..... be restricted to the rear except where they are part of the established local character <u>and a new extension or dormer would not have an adverse impact on the amenity of the area or the significance of heritage assets;</u> <del>rooflights should be confined to the rear or hidden slopes;</del> re-roofing materials should <del>match the original</del> <u>avoid the use of inappropriate substitute materials that can erode the character and appearance of buildings and areas.</u></p> <p>Chimneystacks ...</p> <p>Change the last sentence of the supporting text:</p> <p>Further guidance..... Haringey's emerging policy DM12 <u>and Haringey Highgate Conservation Area Appraisal and Management Plan, including companion Design Guide;</u> and Camden Planning Guidance 1: <u>Design paragraphs 5.6 to 5.29.</u></p>	<p>The modifications provide more flexibility to support sustainable development, consistent with higher level policies, but do not change the main intent of the policy. Therefore the modifications are not considered to impact on the baseline assessment.</p> <p>S1/S2</p>
PM20	Pages 57 & 58	<p>Policy DH6: Front Boundaries</p> <p><del>The removal of</del> Original boundary walls, gate piers or railings <u>should be retained only where unless their removal is necessary</u> due to the condition <u>of a</u></p>	The modification provides more flexibility to support sustainable development, consistent with higher level policies, but retains the main intent of the policy intent. Therefore the modification is not

		<p><u>structure, or replacement provision is proposed which would enhance the character of the area. justifiable due to their structural condition...</u></p> <p>III. <del>Affect the</del> <u>Would result in a loss of visual permeability or and connectivity through the scheme public accessibility where this contributes to local character.</u></p> <p>Supporting text - New sentence at top of Page 58: <u>Permitted development rights mean that planning permission may not be needed for works to front boundaries for certain developments. However, f</u> Front gardens and boundary walls.....</p> <p>New sentence at end of supporting text: <u>It may be desirable to reinstate boundary treatments where they have been lost in some cases.</u></p>	<p>considered to impact on the baseline assessment.</p> <p>S3</p> <p>S1/S2</p> <p>S2</p>
PM21	Page 58	<p>Policy DH7: Basements</p> <p>Where basement development.....</p> <p>1. <del>Enhanced</del> Impact Assessment Requirements</p> <p>2. Protection for Neighbours</p> <p>Where a Construction Management Plan (CMP) is <u>secured, it a condition of planning consent, this plan should be submitted, and must be approved by the LPA, prior to the commencement of works. Or as required by the condition. Unless justified by exceptional circumstances (for example, concrete pouring), the ... Sundays or public holidays.</u></p> <p>Supporting text - amend the sub-title to read:</p>	<p>S1</p> <p>S1/S2</p> <p>S1</p>

		<p><del>Enhanced</del> Basement Impact Assessments (BIAs)</p> <p>Add text to the end of the 4<sup>th</sup> paragraph:</p> <p>The Forum’s Plan seeks to build.....and robust manner.  <u>Applications for basements in Highgate must therefore meet the requirements of the relevant borough policy and supplementary guidance and Policy DH7.</u></p> <p>Protection for Neighbours</p> <p>It is difficult .....Evidence Report Feb 2016). <del>This policy seeks to mitigate as far as possible,</del> <u>The effect of construction on neighbouring residents should be mitigated as far as possible.</u> The CMP .... two years to complete. <u>CMPs should also include limits on hours of construction. Construction working hours do not fall under planning legislation but under the Control of Pollution Act 1974. Camden’s construction working hours are set out in its Guide for Contractors Working in Camden. The Neighbourhood Forum recommends that, unless justified by exceptional circumstances (for example, concrete-pouring), work on basements should be limited to 8am-6pm on Mondays to Fridays only. High impact works, including all demolition and concrete breaking, should be restricted to 9am-noon and 2pm-5.30pm on weekdays. At no time should there be any works on Saturdays, Sundays or public holidays. These limited hours of construction in Part 2 of the policy have been introduced recently by the Royal Borough of Kensington and Chelsea as part of their Code of Construction Practice.</u></p>	<p>S2/S3</p> <p>S3</p> <p>S1/S2</p> <p>The modifications reflect the Forum’s preferred arrangements for construction working hours however recognising that this matter does not fall under planning legislation. The change may have a positive impact on some SEA objectives, particularly SEA 7, however effects are uncertain as this will be subject to implementation on individual site circumstances.</p>
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PM22	Page 60	<p>Policy DH8: Refuse Storage</p> <p><u>Where appropriate, All proposals for new development buildings will be required ....</u></p>	<p>S3. The modification reflects that the requirements will not be relevant for all development. The intent of the policy remains and there is therefore no impact on the baseline assessment.</p>
PM23	Page 62	<p>Policy DH10: Garden land and Backland Development</p> <p>1. <del>Development in back gardens .... hobby rooms, greenhouses.</del> <u>There will be a presumption against the loss of garden land in line with higher level policies.</u></p> <p>2. <del>Other b-Backland .....</del>following conditions:.....</p> <p>II. Proposals, including conversions ... on front gardens, <del>will be resisted unless</del> should be accompanied by satisfactory <u>mitigation measures such as landscaping proposals</u> which address drainage.</p> <p>III. Alterations and extensions .... in materials that <del>match the original or neighbouring buildings</del> <u>deliver high quality design and reinforce local distinctiveness.</u></p>	<p>S3</p> <p>S3</p> <p>The modification provides more flexibility to support sustainable development, consistent with higher level policies, but retains the main intent of the policy intent. Therefore the modification is not considered to impact on the baseline assessment.</p>
PM24	Pages 63 & 64	<p>Policy DH11: Archaeology</p> <p><del>Within the area of archaeological potential shown on the accompanying map and in the designated Archaeological Priority Areas of Archaeological Value as shown on the Councils' Policies Map, where planning permission has been granted, a condition will be required for, in the first place,</del> <u>development proposals will be required to assess the</u></p>	<p>The modification sets the scope of policy to designated Archaeological Priority Areas. Through the APA review process, there is a potential for these to be areas to be expanded where this can be justified by evidence. The change is not considered to impact on the baseline</p>

		<p>potential impact on archaeological assets. <u>Where appropriate, a desktop survey for developments which require significant digging down. Such developments would include those laying new foundations or excavating a basement. should be undertaken to assist in the assessment, and Pending the findings, a further field evaluation or trial excavation may be required and if necessary, more complete excavation. Proposals will be expected to provide satisfactory arrangements for excavation and recording, in advance of development. The information thus obtained from the desktop surveys will be published or otherwise made publicly available. ....</u></p> <p>Fig. 14 should be amended to show only the designated Archaeological Priority Areas, and the title of the map should refer to these rather than “Areas of Archaeological Value”.</p> <p>Amend supporting text on Page 64:  Haringey SPG2 (Conservation and Archaeology) Section 6, SITES OF ARCHAEOLOGICAL IMPORTANCE – dating to 2006 but, according to Haringey’s website, still only in draft – shows <del>an inadequate</del> <u>some albeit not total</u> understanding of the archaeological potential of the area, <del>and its requirement for archaeological assessment and excavation has rarely been implemented in the Highgate area. Camden’s policy on archaeology is limited to</del> <u>comprises</u> a brief statement in its Core Strategy (25.22) <del>which is both inadequate and out of date. Neither policy embodies sufficient</del> ..... of the Highgate area.</p> <p><del>However, Figure 14 shows that these are too limited in extent and demonstrates that archaeological remains from all</del></p>	<p>assessment.</p> <p>The modifications will ensure that proposals give consideration to their impact on archaeological assets at the front end of the application process. This is likely to have positive effects, particularly on SEA objective 8, and thus reinforce the baseline assessment of significant positive effects.</p> <p>S1</p> <p>S1</p> <p>S1</p> <p>S1</p>
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		<del>periods can be expected</del> the designated Archaeological Priority Areas. The available evidence .....	
PM25	Pages 67 & 68	<p>Policy KS1: 460-470 Archway Road</p> <p>Add the following criterion:</p> <p><u>VIII. Development should not adversely affect the operation of the London Underground air shaft or TfL Freehold land on the site, or prevent access to the Highgate Depot.</u></p> <p>Extend paragraph 4.3.2 as follows:</p> <p><u>VI.TfL should be consulted on any development proposals to ensure that its operational requirements are recognised and secured.</u></p>	<p>The modification will ensure that Transport for London operational land is not compromised by development. It is therefore expected to have a positive impact, particularly on SEA objectives 1 and 12.</p> <p>S2</p>
PM26	Page 69	<p>Policy KS2: Former Highgate Station Buildings and Surrounds</p> <p>Any allocation of land ....</p> <p>I.The development includes.....existing <u>locally</u> listed station .....</p> <p>II.Any further buildings ....and the height <del>policies</del><u>considerations</u> set out in .....</p> <p><u>and</u></p> <p><u>VII. Development should be of high quality design and layout, and have no adverse impact on the amenity of neighbouring residents.</u></p>	<p>S1</p> <p>S3</p> <p>The modification will help to ensure delivery of high quality design and protection of local amenity. This is likely to reinforce the positive effects of the baseline assessment.</p>

PM27	Pages 71, 72 & 73	<p>Figure 18 should be modified to remove the reference to Significant Open Local Land and refer to land within the green line as “land with potential for open space provision”.</p> <p>Policy KS3: Highgate Bowl</p> <p><del>In the site map, Development offers the opportunity to secure the area the land within the green line, on the site map, as open space. is designated as SLOL (Significant Local Open Land). This policy refers to any allocation or development...</del></p> <p>KS3.II Any proposal seeking to deliver new development within the fringe locations of the Bowl must ensure that the open character of the Bowl is maintained <del>under the classification of Significant Local Open Land</del>, assist the Bowl...</p> <p>KS3.IV Any development... must additionally respect the local built form and <u>any identified</u> vistas leading into and out of the Bowl</p> <p>KS3.V <del>Any proposals to develop</del> should demonstrate how they have considered, and where appropriate, will deliver improved access to <del>the centre of</del> <u>and within</u> the Bowl both by foot and bicycle, <u>subject to the operational requirements of existing landowners and/or occupiers.</u></p>	<p>S1</p> <p>S1/S3. The modification provides that KS3 is consistent with the Local Plan but does not change the main intent of the policy objectives.</p> <p>S1</p> <p>The modification ensures that due consideration is given to identified vistas leading into and out of the bowl. This slightly narrows the scope of the requirements but the change is not considered to impact significantly on the baseline assessment.</p> <p>S1/S3. The modification provides that KS3 is consistent with the Local Plan but does not change the main intent of the policy objectives.</p>
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PM28	Page 75	<p>Policy KS4: 40 Muswell Hill Road</p> <p>KS4.I The development contributes towards <del>all types of meeting</del> local housing need, in line with policies elsewhere in this Plan (see SC1);</p> <p>KS4.IV The form, height, massing .... should preserve <del>and or</del> enhance ..... New development should make use of the relief/topography of the land and adopt appropriate heights <del>in accordance with</del> <u>having regard to</u> the 2015 Urban Character Study to ensure that the built form is not overbearing in nature”.</p>	<p>The modification provides a more effective approach for delivering sustainable development recognising that the site is unlikely to meet the full complement of local housing needs. The change is not considered to impact on the baseline assessment.</p> <p>S3</p>
PM29	Page 87	<p>Appendix 1 – Add a new introductory sentence:</p> <p><u>The following Appendices are background evidence documents which have been used to develop the Neighbourhood Plan.</u></p>	<p>S1</p>